



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 18 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7663 5769
RETURN RECEIPT REQUESTED

Ms. Jennifer Bogs
Environmental Manager
Wheatland Tube Company – Chicago Division
4435 South Western Boulevard
Chicago, Illinois 60609

Re: Notice of Violation
Compliance Evaluation Inspection
EPA ID No. ILD 069 992 014

Dear Ms. Bogs:

On August 13, 2014 a representative of the U.S. Environmental Protection Agency inspected the Wheatland Tube Company – Chicago Division facility located in Chicago, Illinois (“Wheatland Tube”). As a large quantity generator of hazardous waste, Wheatland Tube is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Wheatland Tube’s compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Wheatland Tube, EPA’s review of records pertaining to Wheatland Tube, and the inspector’s observations, EPA has determined that Wheatland Tube has unlawfully stored hazardous waste without a permit or interim status as a result of Wheatland Tube’s failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which Wheatland Tube was out of compliance at the time of the inspection in paragraphs 1-3, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The

exemption conditions identified in paragraphs 1-3 are also independent TSD requirements incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of Wheatland Tube to comply with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265] (if the facility should have fully complied with the requirements for interim status), or Ill. Admin. Code tit. 35 Part 724 [40 C.F.R. Part 264] (if the facility should have been permitted).

Finally, EPA has determined that Wheatland Tube was not following the requirements related to universal waste, as described in paragraph 4, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

At the time of the inspection, Wheatland Tube was out of compliance with the following large quantity generator permit exemption conditions:

The permit exemption conditions identified below in paragraphs 1-3 are also independent TSD requirements violated by Wheatland Tube:

1. Contingency Plan

Under Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.152 [40 C.F.R. §§ 262.34(a)(4) and 265.52], a large quantity generator must have a written contingency plan for his facility. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water. The provisions of the plan must be carried out immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents which could threaten human health or the environment.

With respect to said contingency plan, a large quantity generator must include a list of all emergency equipment at the facility (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), where this equipment is required. This list must be kept up to date. In addition, the plan must include the location and a physical description of each item on the list, and a brief outline of its capabilities.

At the time of the inspection, Wheatland Tube's contingency plan, which was undergoing revision, did not include a map of the location where Wheatland Tube stores hazardous waste, and it lacked locations and descriptions of emergency equipment.

By e-mail dated October 14, 2014 and by letter dated October 15, 2014, Wheatland Tube provided EPA with its revised "Emergency Action, SPCC, Hazardous Waste and

Chemical Safety Plan.” The revised plan included a sketch of the 90-day hazardous waste storage area as well as a map depicting locations of fire extinguishers, eye wash stations, personal protective equipment and spill kits at Buildings 1, 2 and 3.

This matter was therefore resolved and no further action is required of Wheatland Tube with respect to the contingency plan requirement violation.

2. Use and Management of Containers

Under Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(A) and 725.276 [40 C.F.R. §§ 262.34(a)(1)(i) and 265.176], a large quantity generator is prohibited from storing ignitable or reactive hazardous waste outdoors within 50 feet of the facility’s property line.

At the time of the inspection, Wheatland Tube was storing flammable hazardous waste (EPA waste code D001) on its outdoor waste storage pad (the Hazardous Waste Pavilion). The Hazardous Waste Pavilion is situated in the east-central part of the facility just several feet from the eastern fence line. The Hazardous Waste Pavilion measures 30 feet across, east to west. Therefore, Wheatland Tube was storing ignitable hazardous waste less than 50 feet from its property line.

3. Training

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility’s compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(a) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(b) and (c) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- 2) A written job description for each position at the facility related to hazardous waste management;

- 3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and
- 4) Records that document that the training or job experience described above has been given to and completed by facility personnel. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)].

At the time of the inspection, Wheatland Tube did not have and was unable to provide in response to a request a list of each position at the facility related to hazardous waste management and the name of the employee filling such position(s).

At the time of the inspection, Wheatland Tube did not have and was unable to provide in response to a request a written description for each position related to hazardous waste management at the facility.

At the time of the inspection, Wheatland Tube did not have and was unable to provide in response to a request a written description of the type and amount of introductory and continuing training given to employees with duties related to hazardous waste management.

By e-mails dated October 14, 2014, December 1, 2014, December 2, 2014, and December 8, 2014, Wheatland Tube provided EPA with training records for calendar years 2011, 2013 and 2014. Wheatland Tube could not produce training records for calendar year 2012. In 2011 and 2013, Wheatland Tube could not produce training records for its emergency coordinators. In 2014, Wheatland Tube did produce training records for employees involved in hazardous waste management duties and for its primary and alternate emergency coordinators.

This matter was therefore resolved and no further action is required of Wheatland Tube with respect to the personnel training requirement violation.

Summary: By failing to comply with the conditions for a permit exemption, above, Wheatland Tube became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. Wheatland Tube failed to apply for such a permit. Wheatland Tube's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 is also an independent violation of the corresponding TSD requirement.

UNIVERSAL WASTE

At the time of the inspection, Wheatland Tube was storing used lamps in the Building 1 Universal Waste Storage Area. The boxes of used lamps were not being stored properly, as described below.

4. Universal Waste Requirements

Under Ill. Admin. Code tit. 35 § 733.113(d)(1), a small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers and packages must remain closed and must lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

Under Ill. Admin. Code tit. 35 § 733.114(e), a small quantity handler of universal waste must label or clearly mark each lamp or a container or package in which such lamps are contained with any one of the following phrases: "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps."

Wheatland Tube is a small quantity handler of universal waste because it accumulates less than 5,000 kilograms of universal waste at any time.

At the time of the inspection, Wheatland Tube's containers of lamps were not labeled with the phrase "Universal Waste-Lamps," "Waste Lamps" or "Used Lamps."

At the time of the inspection, Wheatland Tube was found to be managing one open container of lamps.

By e-mail dated August 14, 2014 and August 19, 2014, Wheatland Tube provided EPA with photos of used fluorescent light bulbs stored in closed and labeled containers.

This matter was therefore resolved and no further action is required of Wheatland Tube with respect to the universal waste labeling and container storage requirements.

At this time, EPA is not requiring Wheatland Tube to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraph 2, above.

During the inspection, as observed by EPA, and after the inspection, as discussed in paragraphs 1, 3 and 4, above, you took certain actions to establish compliance with the above permit exemption conditions and TSD requirements and with the above universal waste requirements.

By e-mail dated January 19, 2015 Wheatland Tube provided EPA with a copy of its facility plot survey. The plot survey stated that the waste storage pavilion is in line with the overhead door of Building 3 and that there is 150 feet between the Building 3 door and the property line.

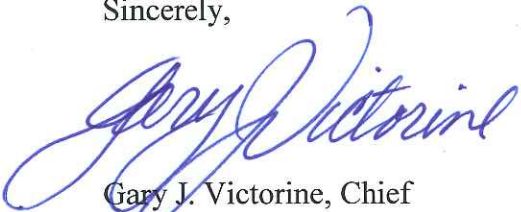
However, based on EPA review of aerial photos, the eastern fence line and eastern end of Building 3 are located less than 140 feet from the railroad tracks to the east of Wheatland Tube. For Wheatland Tube's property line to extend 150 feet east of the Building 3 overhead door it would extend beyond the railroad easement and encroach upon the railroad tracks.

Therefore, Wheatland Tube did not include any actions taken related to the storage of ignitable hazardous waste less than 50 feet from your property line as stated in paragraph 2, above.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to paragraph 2. You should submit your response to Michael Valentino, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Mr. Valentino, of my staff, at 312-886-4582 or at valentino.michael@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA, (todd.marvel@illinois.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

MEMORANDUM TO FILE

INSTALLATION NAME: Wheatland Tube Company – Chicago
Division

U.S. EPA ID No.: ILD 069 992 014

LOCATION ADDRESS: 4435 South Western Boulevard
Chicago, Illinois 60609

NAICS CODES: 331210 (Iron and Steel Pipe and Tube
Manufacturing from Purchased Steel)

DATE OF INSPECTION: August 13, 2014

EPA INSPECTOR: Michael Valentino

PREPARED BY:

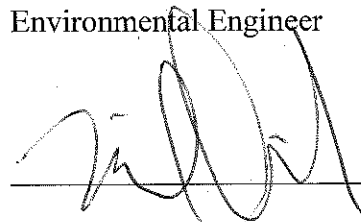


Michael Valentino,
Environmental Engineer

2-5-15

Date

REVIEWED BY:



Michael Cunningham, Chief
Compliance Section 1
RCRA Branch

2-5-15

Date

Purpose of Inspection:

The purpose of the inspection was to perform an unannounced compliance evaluation inspection (CEI) at the Wheatland Tube Company – Chicago Division (“Wheatland Tube”) facility in Chicago, Illinois, a large quantity generator of hazardous waste, to determine its compliance with the Resource Conservation and Recovery Act, specifically the Standards Applicable to Generators of Hazardous Waste, Standards for Land Disposal Restrictions, and Management of Used Oil set forth at 35 Illinois Administrative Code (IAC), Title 35: Environmental Protection, Subtitle G: Waste Disposal, Chapter I: Pollution Control Board, and Title 40 of Code of Federal Regulations (40 CFR) Parts 262 to 265, 268 and 279, respectively.

Participants:

Jennifer Bogs, Environmental Manager, (773-346-8805; jennifer.bogs@jmcsteel.com), represented Wheatland Tube. Michael Valentino represented U.S. EPA Region 5, Land and Chemicals Division, RCRA Branch.

Installation Description:

Wheatland Tube is a division of JMC Steel Group. Wheatland Tube manufactures electrical conduit consisting of intermediate metal conduit (IMC) and electrical metallic tubing (EMT), fence and mechanical tube of various shapes, lengths and gauge.

Wheatland Tube is located in an industrial-commercial-residential area on Chicago’s near southwest side. Wheatland Tube’s facility is bordered furthest on the west by the easternmost northbound and southbound lanes of Western Boulevard; on the east by railroad tracks; at the south of Building 3 by 47th Street and at the south of Building 1 by 45th Street; at the west of Building 2 by Oakley Avenue; and its northern property boundary lies approximately 300 feet south of 43rd Street. Wheatland Tube is situated in an Environmental Justice (EJ) area. A site map is attached to this report. (See Attachment 1)

Wheatland Tube operates four similar mills. Mills 1 and 2 are located in Building 1. Mills 3 and 4 are located in Building 3. (See Aerial Photo, below)

Flat rolled steel coils (20 ton rolls) are received on flat-bed tractor-trailer trucks. The rolls pass through a slitter where they are cut to width depending on the tube diameter of the final product. The steel strips are sent to an alkaline strip washer to remove oils and impurities. The strips are formed into a tubular shape and seam-welded, producing tubes of varying diameters. Coatings are applied to the tubes and they are then cleaned in an acid bath which uses hydrochloric acid. The tubes are galvanized with molten zinc. The tubes are then sent to a quench bath for cooling before being dipped in a chromate solution to provide corrosion protection. Final product is cut to length and sent to Building 2 for shipment to customers.

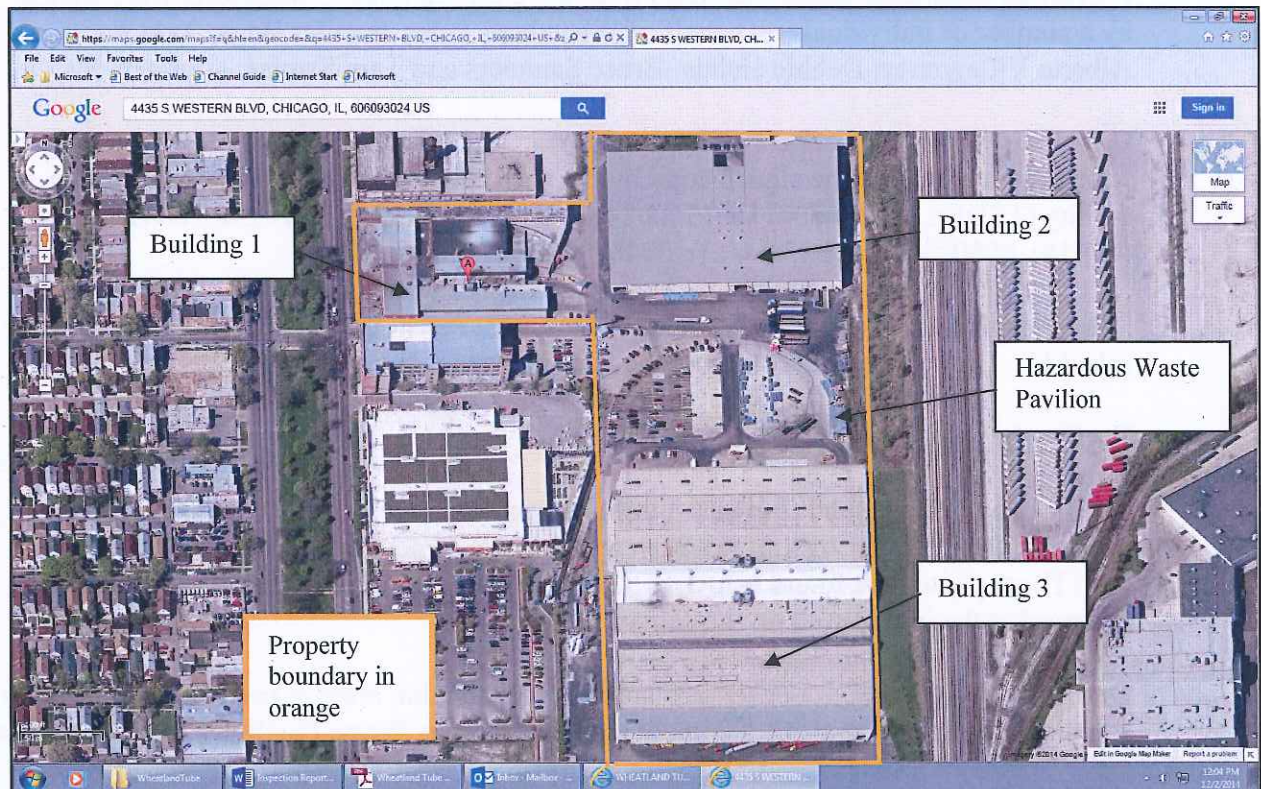
Wheatland Tube operates wastewater treatment systems for process wastewater at both Building 1 and Building 3. Discharge of treated wastewater is governed by a discharge authorization permit issued by the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC). Wastewater treatment consist of neutralization followed by metals precipitation.

Waste streams generated at the facility include solvent-based paints, spent rags containing acetone, spent hydrochloric acid, liquid chromium from chromate conversion coating, and aerosol spray cans. Wheatland Tube also generates used oil and universal waste (spent fluorescent lamps and bulbs).

Wheatland Tube operates one 90-day hazardous waste storage area, the Hazardous Waste Pavilion, a covered concrete pad measuring approximately 70 ft by 25 ft and situated along the eastern property fence line just north of Building 3. Wheatland Tube manages several satellite accumulation area (SAA) containers at its four mills.

Wheatland Tube employees approximately 250 people at this location. Wheatland Tube operates three shifts around the clock, Monday through Friday, with occasional 24-hour days on Saturdays during the summer.

Aerial Photo:¹



¹ Property boundary to south extends to northern sidewalk of 47th Street (not shown in aerial photo).

Opening Conference:

I arrived at Wheatland Tube at approximately 10:15 am on Wednesday, August 13, 2014. I reported at the guard shack and then parked my vehicle. I entered the guard shack and signed in. Security notified Ms. Bogs who arrived within minutes. I presented her with my enforcement credentials and I informed Ms. Bogs of the nature of the inspection.

We left the guard shack and walked to her office which is located in Building 1. I informed Ms. Bogs of the documents I would want to review and what I was interested in seeing during the site walk-through inspection.

Ms. Bogs gave me a general overview of operations, some of which is incorporated above under "Installation Description."

Records Review:

At the conclusion of the opening meeting, I immediately began reviewing Wheatland Tube's records, beginning with its manifests.

Hazardous Waste Manifests

I reviewed hazardous waste manifests from 2012 through 2014. Manifests were signed by a number of individuals on behalf of Wheatland Tube: Jennifer Bogs, Axel Avila, Alberto Villagomez, Debbie Hebda, Bruce Saunders and Tom Sweiss.

On the day of the inspection I noted the following manifests (date shipped by generator) which did not include the signed copy by the receiving treatment, storage or disposal facility (TSDF): 004886804FLE (5/28/14), 004886802FLE (5/23/14), 001684227GBF (4/4/14), 006053681FLE (3/14/13), 004879080FLE (9/26/13).²

After completing review of Wheatland Tube's most recent three years of manifests, I asked Ms. Bogs if we could conduct the facility inspection.

Facility Inspection and Observations:

Ms. Bogs and I began the site walk-through at approximately 12:45 pm. During the course of the walk-through, I took eleven (11) photographs between 1:01 pm and 1:24 pm. These photos are found below. They are true and representative of the conditions I observed at the installation on the date of the CEI.

During the walk-through I observed satellite accumulation areas at each of the four mills (Photos 1-3), drums awaiting shipment at the Hazardous Waste Pavilion (Photos 4-8), the

² The missing TSDF-signed manifests were subsequently sent to the author by Jennifer Bogs via e-mail dated August 19, 2014. See "Post Inspection Follow-up" below and Attachment 5. The receiving facilities returned signed copies of the manifests to Wheatland Tube within 35 days of shipment.

used oil storage tank in Building 1 (Photo 9) and the universal waste storage area in Building 1 (Photos 10-11).

All hazardous waste containers were closed and labeled. The 90-day waste storage was equipped with four fire extinguishers and a spill kit. The berm surrounding the waste storage pad was made of concrete and stood 10"-12" in height. The storage pad was underlain with epoxy-coated concrete. I did observe minor surficial cracks in the concrete as well as peeling away of the epoxy coating in a number of locations. The waste storage area is covered with a steel roof to protect against the elements. There is no emergency communication device at the Hazardous Waste Pavilion but workers do carry two-way radios. The hazardous waste storage pad is located north of Building 3 on the eastern end of the facility within several feet of the facility's eastern fence line.

I observed one open box of used bulbs. (Photo 10)



Photo 1	Wheatland Tube 4435 S. Western Boulevard Chicago, IL 60609
8/13/14 1:01 pm Taken by: Michael Valentino	<u>Description:</u> Building 3, Mill 3. Waste paint satellite accumulation area (2 drums of waste paint, center and right; one drum of flammable rags, left).



Photo 2	Wheatland Tube 4435 S. Western Boulevard Chicago, IL 60609
8/13/14 1:02 pm Taken by: Michael Valentino	<u>Description:</u> Building 3, Mill 3. Satellite accumulation area drum of zinc dust paint.



Photo 3	Wheatland Tube 4435 S. Western Boulevard Chicago, IL 60609
8/13/14 1:04 pm Taken by: Michael Valentino	<u>Description:</u> Building 3, Mill 4. Waste paint satellite accumulation area (center drum; product drum to left).



Photo 4	Wheatland Tube 4435 S. Western Boulevard Chicago, IL 60609
8/13/14 1:09 pm Taken by: Michael Valentino	<u>Description:</u> Hazardous waste pavilion. East end of site, north of Building 3. Looking northeast. Hazardous waste pad measures approximately 70 ft (N-S) by 25 ft (E-W). The concrete berm surrounding the pad is approximately 10-12" high and 8" wide. Spill kit to right of photo. Forklift ramp, lower right of photo. One of four fire extinguishers can be seen on corner post, lower left of photo. Fire extinguisher maintenance is provided by Total Fire & Safety, Inc., Woodridge, IL. Tags on fire extinguishers indicate servicing in 2014. The property fence line (approx. 7-ft chain link with barbed wire) is immediately east of the waste storage area. Ignitable (D001) waste is stored less than 50 feet from the property line.



Photo 5	Wheatland Tube 4435 S. Western Boulevard Chicago, IL 60609
8/13/14 1:14 pm Taken by: Michael Valentino	<u>Description:</u> Hazardous waste pavilion. Looking northwest. Waste inventory on day of inspection. Adequate aisle space in this area. Containment provided by epoxy-coated concrete floor and surrounding berm (10"-12" high). Epoxy coating is peeling off in spots; minor cracks in the surface of the concrete. Fire extinguisher can be seen on corner post, center of photo. No emergency communication device at the pavilion, but workers have two-way radios. Building 2 is in background.



<p>Photo 6</p>	<p>Wheatland Tube 4435 S. Western Boulevard Chicago, IL 60609</p>
<p>8/13/14 1:14 pm Taken by: Michael Valentino</p>	<p><u>Description:</u> Hazardous waste pavilion. Looking northeast. Containment trench (beneath yellow grating, right of photo) is blinded off allowing for rainwater or accidental to be collected and removed. Some weathering of epoxy coating is evident in photo. Sign marking location of fire extinguisher can be seen on corner post, about 8 ft above ground level. The property fence line (approx. 7-ft chain link with barbed wire) is immediately east of the waste storage area. Ignitable (D001) waste is stored less than 50 feet from the property line.</p>



Photo 7	Wheatland Tube 4435 S. Western Boulevard Chicago, IL 60609
8/13/14 1:14 pm Taken by: Michael Valentino	<u>Description:</u> Hazardous waste pavilion. Looking southeast. Inventory consists of both hazardous and nonhazardous waste. The property fence line is approximately five feet to the east of the containment berm (best seen, lower front left of photo).



Photo 8	Wheatland Tube 4435 S. Western Boulevard Chicago, IL 60609
8/13/14 1:14 pm Taken by: Michael Valentino	<u>Description:</u> Hazardous waste pavilion. Looking southwest. Building 3 is in background. Waste inventory on west end of pad. Notice wearing of epoxy coating, center-left of photo. Fire extinguisher mounted and sign posted on corner post, background. Forklift ramp safety provided by guard rail and construction bollards, left background. Forklift ramp and high concrete perm around perimeter provide sufficient containment of liquid waste in the event of spillage from drums.



Photo 9	Wheatland Tube 4435 S. Western Boulevard Chicago, IL 60609
8/13/14 1:21 pm Taken by: Michael Valentino	<u>Description:</u> Building 1. Used oil tank.



Photo 10	Wheatland Tube 4435 S. Western Boulevard Chicago, IL 60609
8/13/14 1:23 pm Taken by: Michael Valentino	<u>Description:</u> Building 1. Universal waste storage area. Box containing spent lamps is open and not marked, "Universal Waste – Lamps," "Waste Lamps," or "Used Lamps."



Photo 11	Wheatland Tube 4435 S. Western Boulevard Chicago, IL 60609
8/13/14 1:24 pm Taken by: Michael Valentino	<u>Description:</u> Building 1. Universal waste storage area. Sealed box containing used fluorescent bulbs. Container needs to be labeled

Records Review (Completion):

We returned to Ms. Bogs' office at approximately 1:30 pm at which time I completed the records review portion of the inspection.

Water Pollution Control Permit

I reviewed Wheatland Tube's Discharge Authorization Permit (DA No. 10132-7.1) issued by the Metropolitan Water Reclamation District of Greater Chicago on October 18, 2013. The permit's expiration date is December 14, 2016.

Under the permit, Wheatland Tube is required to semi-annually sample four sampling points: 1C (acid pickle, fume scrubber); 2A (acid pickle, scrubber); 2C (steel tubing manufacturing); and 3A (steel tubing manufacturing). Wheatland tube monitors for pH,

suspended solids, fats, oil and grease (FOG), biochemical oxygen demand (BOD) and the following parameters: cyanide (total), copper, nickel, chromium (total), chromium (hexavalent), zinc, lead, cadmium, iron and mercury.

Annual Hazardous Waste Reports

I requested and received annual hazardous waste generator reports for reporting years 2012 and 2013.

The annual reports identified NAICS (North American Industry Classification System) code 331210.

Wheatland Tube submits separate annual hazardous waste reports (HWRs) to the Illinois Environmental Protection Agency (IEPA) for Building 1 and Building 3.

For Building 1, the address of which is 4435 South Western Boulevard, the EPA RCRA ID number is ILD069992014 and its IEPA ID number is 0316615049. For Building 3, the address of which is 2300 West 47th Street, the EPA RCRA ID number is ILD 964778241 and its IEPA ID number is 0316615090. Both addresses report to the State as a large quantity generator.

I informed Ms. Bogs that since both Building 1 and Building 3 lie within one contiguous parcel of land with no public roadways separating the two buildings only one EPA ID number is necessary. Review of the site drawing (Attachment 1) confirms this.³

Following the inspection, Ms. Bogs e-mailed to me copies of the HWRs for Building 1 and Building 3 for calendar years 2012 and 2013. I reviewed these and found several errors. Wheatland Tube made corrections to its 2012 and 2013 HWRs. (See "Post Inspection Follow-up," below.)

Written Waste Minimization Plan

Upon request, Ms. Bogs provided me with a copy of Wheatland Tube's waste minimization plan, which was dated February 3, 2014.

Container Inspection Logs

I requested and received weekly container inspection logs for the 90-day hazardous waste storage area for calendar years 2012 through 2014.

I reviewed these records and found them to be in good order with no gaps in the inspection logs.

³ Also, *rf.* aerial photo at pg. 3 of this report.

Waste Profiles

I requested and received waste profiles for the waste streams generated at the facility.

Contingency Plan

I asked for the facility's contingency plan and received a copy of Wheatland Tube's "Emergency Action/Hazardous Waste Contingency/SPCC Plan," which was dated August 4, 2011 ("2011 plan").⁴

The 2011 plan identified Jeff Jabis, Operations Manager as the Primary Emergency Coordinator (EC) and Jim Lipka, Superintendent, and Michael Dawson, Safety Manager, as the Alternate Emergency Coordinators.

The 2011 plan did not include a map of the Hazardous Waste Pavilion, and it lacked locations and descriptions of emergency equipment.

At the time of the inspection Ms. Bogs said that Wheatland Tube was updating its emergency action plan.

I reviewed the updated plan, which was in the progress of final revisions at the time of the inspection. The updated plan included Ms. Bogs as the Primary EC and Ivan Cardona, Safety Manager, and Mr. Lipka, Production Manager, as the Alternate ECs.

At the time of the inspection I asked Ms. Bogs to send me the revised contingency plan once Wheatland completed its revisions. (See "Post Inspection Follow-up," below.)

RCRA Training

I requested personnel training records. Ms. Bogs was unable to produce training records at the time of the inspection but said she would send the documents to me later. (See "Post Inspection Follow-up," below.)

Exit Conference:

At the completion of the records review, I summarized my findings with Ms. Bogs.

Before leaving, I presented Ms. Bogs with copies of the Region 5 Pollution Prevention (P2) contact information and State Agency P2 contact information fact sheet and the Illinois Waste Management and Research Center (WMRC) brochure entitled, "SUSTAINABLE SOLUTIONS – A COOPERATIVE PROGRAM FOR ILLINOIS INDUSTRY."

⁴ SPCC stands for Spill Prevention, Control, and Countermeasure Plan (See 40 CFR §§ 112.3 and 112.7), which Wheatland is required to have by virtue of its above-ground bulk chemical and diesel fuel storage tanks.

I left the site at approximately 3:00 pm.

Post Inspection Follow-up:

Following the inspection, I provided compliance assistance to Ms. Bogs, requested specific information by e-mail and reviewed the documents which she provided in response to my requests.

The following narrative focuses on the documents I received and reviewed post-inspection, and on compliance issue corrections made by Wheatland Tube subsequent to the inspection.

- Revised contingency plan
- Personnel training records
- Management of universal waste
- Corrections to 2012 and 2013 annual hazardous waste reports
- Hazardous waste manifests

Contingency Plan

By e-mail dated October 14, 2014 and by letter dated October 15, 2014, Wheatland Tube provided EPA with its revised "Emergency Action, SPCC, Hazardous Waste and Chemical Safety Plan."⁵

The revised plan lists Ms. Bogs, Environmental Manager, as the 24-hour primary emergency coordinator for environmental spills and Mr. Cardona, Safety Manager, as the 24-hour primary emergency coordinator for fire and safety emergencies. Mr. Lipka, Production Manager, is the alternate emergency coordinator.

The revised plan included a sketch of the 90-day hazardous waste storage area (Appendix C) as well as a map depicting locations of fire extinguishers, eye wash stations, personal protective equipment and spill kits at Buildings 1, 2 and 3 (Appendix F).

I reviewed the revised 2014 plan and found that it contained the major elements as required by 35 IAC § 725.152 [40 CFR § 265.52].

Personnel Training Records

According to the revised contingency plan, the following Wheatland Tube employees receive annual RCRA training in hazardous waste management: (1) Jennifer Bogs, Alberto Villagomez, Alexis Lopez and Eduardo Valenzuela of the Wastewater Treatment and Environmental Team (§6, pg. 10, ¶1; §9, pg. 14, ¶4); (2) Emergency Coordinators (in addition to Ms. Bogs) Ivan Cardona and Jim Lipka (§9, pg. 14, ¶4).

⁵ E-mail from Jennifer Bogs to Michael Valentino, 10/14/14 at 12:48 pm.

Ms. Bogs was able to provide by e-mail documentation (see below) of training for calendar years 2011, 2013 and 2014. Wheatland Tube could not produce documentation of training in 2012.

Training of employees involved in hazardous waste management practices and/or of employees designated as the primary and alternative emergency coordinators is summarized below by calendar year for the period 2011 through 2014.

2011

In 2011, Mr. Villagomez and Axel Avila received RCRA refresher training on November 3, and Ms. Lopez received RCRA refresher training on November 4.⁶

As noted above⁷ the 2011 emergency plan lists Mr. Jabis as the primary EC and Messrs. Lipka and Dawson as the alternate ECs. Wheatland was unable to produce training documentation for these employees who served in the role of emergency coordinators.

2012

For calendar year 2012, Wheatland did not produce any training documentation for its employees.

2013

In 2013, Mr. Villagomez, Riccardo Gomez, Christine Walczak, Joseph Burns, and Mr. Lipka received RCRA refresher training on January 15.⁸ Ms. Lopez received RCRA refresher training on January 21.⁹

Also, Ms. Lopez and Messrs. Villagomez and Avila received Hazardous Material Regulation training on May 9.¹⁰

Wheatland was unable to produce training documentation for emergency coordinators Jabis, Lipka and Dawson.

2014

In 2014, Ms. Bogs, Messrs. Villagomez and Avila, and Ms. Lopez received RCRA refresher training on January 28.¹¹

⁶ E-mail from Jennifer Bogs to Michael Valentino, 12/1/14 at 3:06 pm.

⁷ *Rf.* pg. 17 of this inspection report, "Contingency Plan."

⁸ E-mail from Jennifer Bogs to Michael Valentino, 12/1/14 at 3:06 pm.

⁹ E-mail from Jennifer Bogs to Michael Valentino, 12/1/14 at 3:06 pm.

¹⁰ E-mail from Jennifer Bogs to Michael Valentino, 12/1/14 at 3:06 pm.

¹¹ E-mail from Jennifer Bogs to Michael Valentino, 12/1/14 at 3:06 pm.

Emergency coordinators Ms. Bogs and Messrs. Cardona and Lipka received RCRA refresher training on September 10.¹²

Eduardo Valenzuela received Hazardous Material Training and Testing on June 3.¹³

Management of Universal Waste

By e-mail dated August 14, 2014 and August 19, 2014, Wheatland Tube provided EPA with photos of used fluorescent light bulbs stored in closed and labeled containers.¹⁴ (Attachment 2)

Corrections to 2012 and 2013 Annual Hazardous Waste Reports

I noted discrepancies with the annual waste reports, particularly with the 2013 annual report and identified these in e-mails to Ms. Bogs dated December 2, 2014, December 8, 2014, and December 9, 2014.¹⁵

By e-mail dated December 9, 2014, Wheatland Tube provided EPA with final corrected copies of its 2012 and 2013 annual hazardous waste reports.¹⁶

Wheatland submitted corrected annual hazardous waste reports to IEPA on December 9, 2014. (Attachment 3)

By e-mail dated December 8, 2014, Wheatland also provided EPA with copies of its 2012 and 2013 hazardous waste shipments summary spreadsheets.¹⁷ (Attachment 4)

Hazardous Waste Manifests

By e-mail dated August 19, 2014, Wheatland Tube provided EPA with the facility-signed copies of the following manifests: 004886804FLE (5/28/14), 004886802FLE (5/23/14), 001684227GBF (4/4/14), 006053681FLE (3/14/13), 004879080FLE (9/26/13).¹⁸

Copies of these manifests are attached to this report (Attachment 5).

¹² E-mails from Jennifer Bogs to Michael Valentino, 10/14/14 at 12:48 pm, 12/2/14 at 1:05 pm, 12/8/14 at 1:34 pm.

¹³ E-mail from Jennifer Bogs to Michael Valentino, 12/8/14 at 1:34 pm.

¹⁴ E-mail from Jennifer Bogs to Michael Valentino, 8/14/14 at 11:36 am and e-mail from Jennifer Bogs to Michael Valentino, 8/19/14 at 2:44 pm.

¹⁵ E-mails from Michael Valentino to Jennifer Bogs, 12/2/14 at 11:41 am, 12/8/14 at 2:40 pm, and 12/9/14 at 10:14 am.

¹⁶ E-mails from Jennifer Bogs to Michael Valentino, 12-9-14 at 10:13 am and 10:58 am.

¹⁷ E-mails from Jennifer Bogs to Michael Valentino, 12/8/14 at 3:19 pm and 3:23 pm.

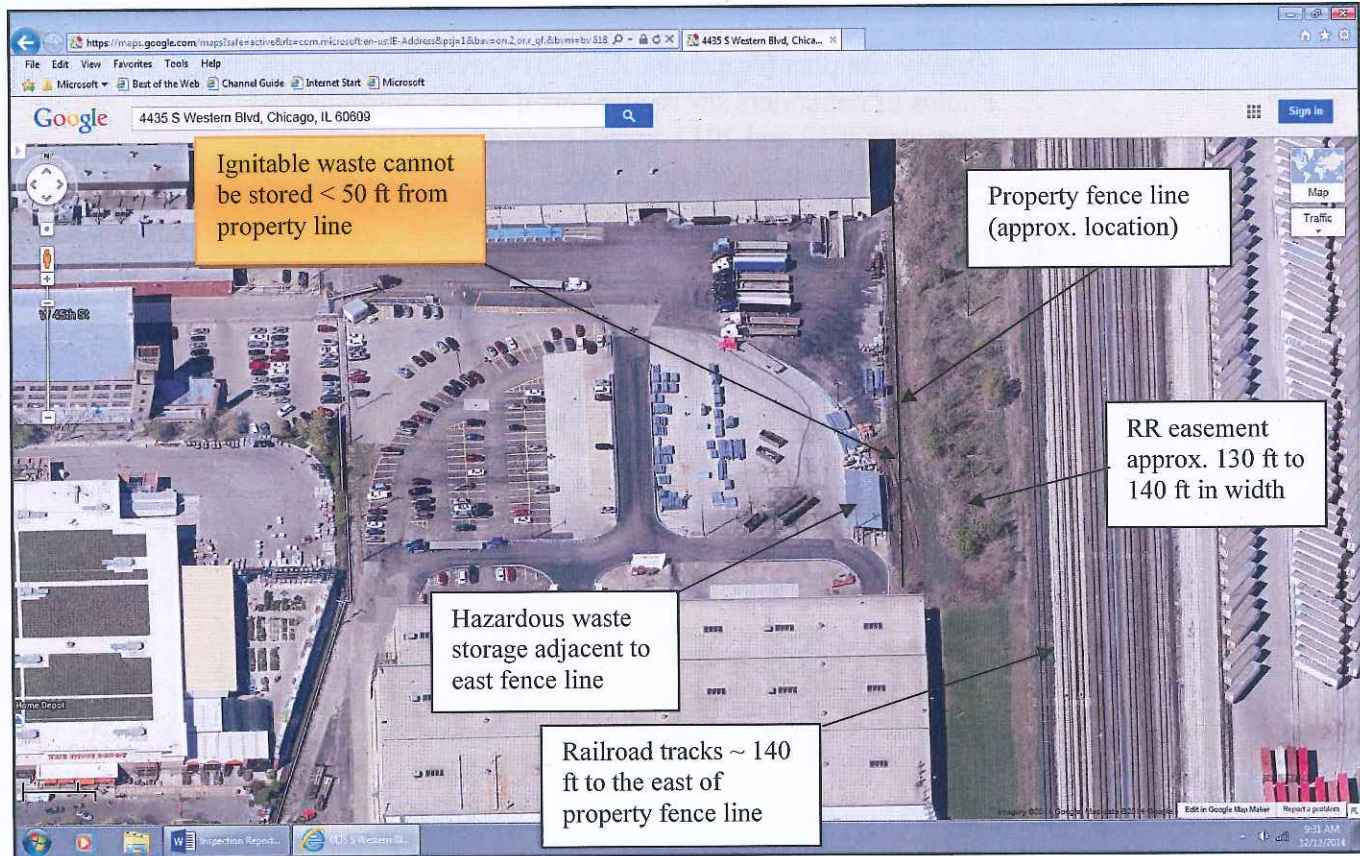
¹⁸ E-mail from Jennifer Bogs to Michael Valentino, 8/9/14 at 2:44 pm.

Additional Area of Concern:

The Hazardous Waste Pavilion is situated adjacent to Wheatland Tube's east property fence line. (See Attachment 1 and aerial photo below)

State and Federal law prohibit large quantity generators from storing reactive or ignitable hazardous waste outdoors within 50 feet of the property fence line. See 35 IAC 725.276 (40 CFR 265.176).

Wheatland Tube stores flammable waste at the Hazardous Waste Pavilion. The hazardous waste storage pad is 25 feet in width (east to west), and its eastern side, running north-south, is approximately five feet from the property fence line. (See Photos 4, 6, 7) Therefore, ignitable (flammable) waste is being stored, at most, 30 feet from the property fence line.



By e-mail dated January 15, 2015, I notified Ms. Bogs that Wheatland Tube was storing ignitable waste at its storage pavilion, which is located less than 50 feet from the eastern property line.¹⁹

¹⁹ E-mail from Michael Valentino to Jennifer Bogs, 1/15/15 at 8:54 am.

In response, by e-mail on January 19, 2015 Wheatland Tube provided EPA with a copy of the facility plot survey (drawing dated May 17, 1996).²⁰ (Attachment 6)

In her response on January 19, 2015, Ms. Bogs stated that the waste storage pavilion is in line with the overhead door of Building 3 (the overhead door located in the far northeastern corner of Building 3), and that there is 150 feet between the Building 3 door and the property line.²¹

However, based on EPA review of aerial photos and scales, the eastern fence line and eastern end of Building 3 are located less than 140 feet from the nearest (westernmost) railroad tracks to the east of Wheatland Tube. For Wheatland Tube's property line to extend 150 feet east of the Building 3 overhead door it would extend beyond the railroad easement and onto the railroad tracks themselves.

Attachments:

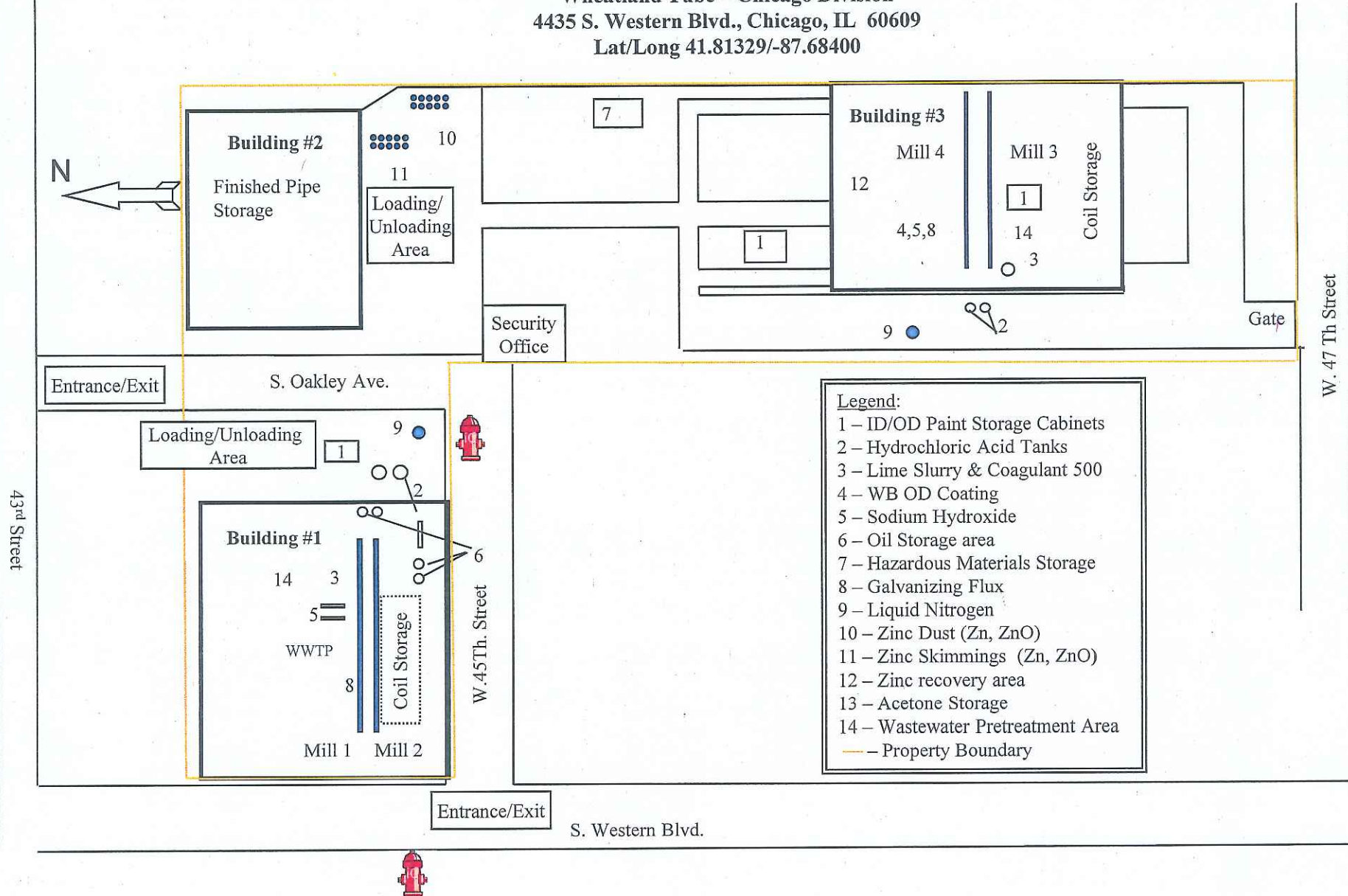
1. Facility site plan (Appendix A to 2014 revised emergency plan)
2. Photos of containers storing universal waste (waste lamps)
3. Corrected 2012 and 2013 annual hazardous waste reports
4. Hazardous waste shipments spreadsheets for 2012 and 2013
5. TSDF-signed hazardous waste manifests
6. Facility plot of survey

²⁰ E-mail from Jennifer Bogs to Michael Valentino, 1/19/15 at 11:21 am.

²¹ E-mail from Jennifer Bogs to Michael Valentino, 1/19/15 at 11:21 am; Attachment 6.

ATTACHMENT 1
FACILITY SITE PLAN

APPENDIX A - SITE PLAN
Wheatland Tube – Chicago Division
4435 S. Western Blvd., Chicago, IL 60609
Lat/Long 41.81329/-87.68400



August 5, 2014

ATTACHMENT 2

PHOTOS OF CONTAINERS STORING UNIVERSAL WASTE

Everlight

Everlight

Phosphor
Lamp

University
Lamp

Everlights

LAMP

CYCLE

Fluorescent Lamp Recycling System

CHANGING

BULB / LAMP RECYCLING AREA

USAP

LAMP



ATTACHMENT 3
CORRECTED 2012 AND 2013 ANNUAL HAZARDOUS WASTE REPORTS



Wheatland Tube
JMC STEEL GROUP

4435 South Western Boulevard
Chicago, Illinois 60609
773-254-0617

December 9, 2014

Illinois Environmental Protection Agency
Bureau of Land #24
1021 N. Grand Ave. E.
Springfield, Illinois 62794-9276

**RE: US EPA ID ILD069992014/ IL EPA 0316615090 and ILD984778241/ IL EPA 0316615049
2012 Hazardous Waste Report Corrections**

To Whom It May Concern:

Upon review of its submitted 2012 hazardous waste report for US EPA IDs ILD069992014/ IL EPA 0316615090 and ILD984778241/ IL EPA 0316615049, Wheatland Tube Co. – Chicago Division discovered two errors to its 2012 hazardous waste report submission. These corrections are attached to this letter and are as follows:

- 1) For US EPA ID ILD069992014/ IL EPA 0316615090, on page 0003 for "Waste Paint Related Material," the quantity generated in the reporting year should be 68,500 lbs.
- 2) For US EPA ID ILD984778241/ IL EPA 0316615049, on page 0002 for "Hazardous Waste Solid (Chromium)," the quantity generated in the reporting year should be 4,050 lbs.

Wheatland Tube – Chicago Division also disclosed these corrections to the US EPA Land and Chemicals Division to RCRA Inspector Michael Valentino. Please feel free to contact me at (773) 346-8805 if additional information is needed or if you have any questions.

Sincerely,


Jennifer Bogs
Environmental Manager
(773) 346-8805

Enclosures

Validated

ILLINOIS Environmental Protection Agency
2012 Hazardous Waste Report
Form IC -- Identification and Certification

US EPA ID: ILD069992014 IL EPA ID: 0316615090

HAZARDOUS
WASTE

RCRA Generator Status: <u>1</u>	<input type="checkbox"/> Transporter of Hazardous Waste <input type="checkbox"/> Transfer Facility (at your site) <input type="checkbox"/> Treater, Storer, or Disposer of Hazardous Waste <input type="checkbox"/> Recycler of Hazardous Waste (at your site) Exempt Boiler and/or Industrial Furnace: <input type="checkbox"/> Small Quantity On-Site Burner exemption <input type="checkbox"/> Smelting, Melting Refining Furnace exemption <input type="checkbox"/> Underground Injection Control
Generator Activities <input type="checkbox"/> United States Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste(hazardous&radioactive) Generator	
Universal Waste Activities <input type="checkbox"/> Large Quantity Handler (5000 kg) <div style="text-align: right;">Managed</div> Batteries _____ Pesticides _____ Mercury Containing Equipment _____ Lamps _____ <input type="checkbox"/> Destination Facility for Universal Waste	Used Oil Activities <input type="checkbox"/> Used Oil Transporter <input type="checkbox"/> Used Oil Transfer Facility <input type="checkbox"/> Used Oil Processor <input type="checkbox"/> Used Oil Re-refiner <input type="checkbox"/> Off-Specification Used Oil Burner <input type="checkbox"/> Marketer Who Directs Off-Spec Oil to Burner <input type="checkbox"/> Marketer Who Claims Oil Meets Spec.
NAICS Code(s) for this Location <u>331210</u> <u>0</u> <u>0</u> <u>0</u>	Site Land Type: <u>1</u> Owner Type: <u>1</u> Owner Start Date: <u>01/01/1969</u> Operator Type: <u>1</u> Operator Start Date: <u>01/01/1969</u>

Comments: N

Company Contact: Jennifer, Bogs

Title: D

Phone: 7733468805

Page : 00002

Validated

ILLINOIS Environmental Protection Agency
2012 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID : ILD069992014 IL EPA ID : 0316615090

SECTION 1. WASTE DESCRIPTION

A. Waste Description: WASTE HYDROCHLORIC ACID

B. EPA Hazardous Waste Code(s) : D002

C. Source Code : G02

D. Form Code : W103

Management Method : _____

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM : 3. Pounds (lbs)

Density : 8.00 lb/gal.

B. Quantity Generated in Current Reporting Year : 2,200.0

SECTION 3: QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System1:Management Method : _____ Quantity managed on-site this year : 0.0

On-Site System2:Management Method : _____ Quantity managed on-site this year : 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year?

Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to : KYD985073196
C. Management method shipped to : H121
D. Total quantity shipped in this reporting year : 1,300.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to : IND000646943
C. Management method shipped to : H121
D. Total quantity shipped in this reporting year : 900.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to : _____
C. Management method shipped to : _____
D. Total quantity shipped in this reporting year : 0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to : _____
C. Management method shipped to : _____
D. Total quantity shipped in this reporting year : 0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to : _____
C. Management method shipped to : _____
D. Total quantity shipped in this reporting year : 0.0

COMMENTS : N

Page : 00003

Validated

ILLINOIS Environmental Protection Agency
2012 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID : ILD069992014 IL EPA ID : 0316615090

SECTION 1. WASTE DESCRIPTION

A. Waste Description: WASTE PAINT RELATED MATERIAL

B. EPA Hazardous Waste Code(s) : D001 F003 F005

C. Source Code : G06 D. Form Code : W209 Management Method :

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM : 3. Pounds (lbs) Density : 8.00 lb/gal .

B. Quantity Generated in Current Reporting Year : ~~65,000.0~~ 68,500.0

SECTION 3: QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System1:Management Method : Quantity managed on-site this year : 0.0

On-Site System2:Management Method : Quantity managed on-site this year : 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to : KYD985073196

C. Management method shipped to : H061

D. Total quantity shipped in this reporting year : ~~65,000.0~~ 68,500.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year : 0.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year : 0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year : 0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year : 0.0

COMMENTS: N

Page : 00004

Validated

ILLINOIS Environmental Protection Agency
2012 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID : ILD069992014 IL EPA ID : 0316615090

SECTION 1. WASTE DESCRIPTION

A. Waste Description: HAZARDOUS WASTE SOLID (ACETONE)

B. EPA Hazardous Waste Code(s) : F003

C. Source Code : G06

D. Form Code : W002

Management Method : _____

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM : 3. Pounds (lbs) Density : 8.00 lb/gal .

B. Quantity Generated in Current Reporting Year : 2,900.0

SECTION 3: QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System1:Management Method : _____ Quantity managed on-site this year : 0.0

On-Site System2:Management Method : _____ Quantity managed on-site this year : 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year?

Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to : KYD985073196

C. Management method shipped to : H141

D. Total quantity shipped in this reporting year : 2,900.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

COMMENTS : N

Page#: 00002 *Validated*

ILLINOIS Environmental Protection Agency
2012 Hazardous Waste Report
Form TI - Transporter Identification

US EPA ID: ILD069992014 IL EPA ID: 0316615090

1.	U.S. EPA ID N	<u>OHD042311209</u>	Hauling Permit	<u>UPW0090502OH</u>
2.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
3.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
4.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
5.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
6.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
7.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
8.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>

Comments: N

ILLINOIS Environmental Protection Agency
2012 Hazardous Waste Report
B.O.L. Inventory Data / Addresses

US EPA ID: ILD069992014

IL EPA ID: 0316615090

Facility Location

Send Mail
Here?

Y

Company Name:	Wheatland Tube		
Telephone:	7732540617	P.O.Box:	
Street Address:	4435 S. Western Blvd.		
City, State, Zip:	Chicago	IL	60609
Contact Person:	Jennifer Bogs		

Owner Address

Send Mail
Here?

N

Company Name:	JMC Steel Group		
Telephone:	3122751600	P.O.Box:	
Street Address:	227 W. Monroe St.		
City, State, Zip:	Chicago	IL	60602
Contact Person:	Jennifer Bogs		

Operator Address

Send Mail
Here?

Y

Company Name:	Wheatland Tube		
Telephone:	7732546017	P.O.Box:	
Street Address:	4435 S. Western Blvd.		
City, State, Zip:	Chicago	IL	60609
Contact Person:	Jennifer Bogs		

Annual Report Mailing Address

Company Name:	JMCSteelGroup-WHEATLANDTUBE		
Telephone:	7733468805	P.O.Box:	
Street Address:	4435 S. Western Blvd.		
City, State, Zip:	Chicago	IL	60609
	First Name	Last Name	Title
Contact Person:	Jennifer	Bogs	D
Email Address:	jennifer.bogs@jmcsteel.com		

Validated

ILLINOIS Environmental Protection Agency
2012 Hazardous Waste Report
Form IC -- Identification and Certification

US. EPA ID: ILD984778241 IL. EPA ID: 0316615049

HAZARDOUS
WASTE

RCRA Generator Status: <u>1</u>	<input type="checkbox"/> N Transporter of Hazardous Waste <input type="checkbox"/> N Transfer Facility (at your site) <input type="checkbox"/> N Treater, Storer, or Disposer of Hazardous Waste <input type="checkbox"/> N Recycler of Hazardous Waste (at your site) Exempt Boiler and/or Industrial Furnace: <input type="checkbox"/> N Small Quantity On-Site Burner exemption <input type="checkbox"/> N Smelting, Melting Refining Furnace exemption <input type="checkbox"/> N Underground Injection Control
Generator Activities <input type="checkbox"/> N United States Importer of Hazardous Waste <input type="checkbox"/> N Mixed Waste(hazardous&radioactive) Generator	
Universal Waste Activities <input type="checkbox"/> N Large Quantity Handler (5000 kg) <div style="text-align: right;">Managed</div> Batteries <input type="checkbox"/> Pesticides <input type="checkbox"/> Mercury Containing Equipment <input type="checkbox"/> Lamps <input type="checkbox"/> <input type="checkbox"/> N Destination Facility for Universal Waste	Used Oil Activities <input type="checkbox"/> N Used Oil Transporter <input type="checkbox"/> N Used Oil Transfer Facility <input type="checkbox"/> N Used Oil Processor <input type="checkbox"/> N Used Oil Re-refiner <input type="checkbox"/> N Off-Specification Used Oil Burner <input type="checkbox"/> N Marketer Who Directs Off-Spec Oil to Burner <input type="checkbox"/> N Marketer Who Claims Oil Meets Spec,
NAICS Code(s) for this Location <u>331210</u> <u>0</u> <u>0</u> <u>0</u>	Site Land Type: <u>1</u> Owner Type: <u>1</u> Owner Start Date: <u>01/01/1969</u> Operator Type: <u>1</u> Operator Start Date: <u>01/01/1969</u>

Comments: N

Company Contact: Jennifer, Bogs

Title: D

Phone: 7733468805

Page : 00002

Validated

ILLINOIS Environmental Protection Agency
2012 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID : ILD984778241 IL EPA ID : 0316615049

SECTION 1. WASTE DESCRIPTION

A. Waste Description: HAZ WASTE SOLID (CHROMIUM)

B. EPA Hazardous Waste Code(s) : D007

C. Source Code : G06

D. Form Code : W002

Management Method : _____

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM : 3. Pounds (lbs)

Density : 8.00 lb/gal.

B. Quantity Generated in Current Reporting Year :

~~3,050.0~~

4,050.0

SECTION 3: QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System1:Management Method : _____

Quantity managed on-site this year :

0.0

On-Site System2:Management Method : _____

Quantity managed on-site this year :

0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year?

Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to :

KYD985073196

C. Management method shipped to :

H121

D. Total quantity shipped in this reporting year :

~~3,050.0~~

4,050.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year :

0.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year :

0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year :

0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year :

0.0

COMMENTS : N

Page : 00003

Validated

ILLINOIS Environmental Protection Agency
2012 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID : ILD984778241 IL, EPA ID : 0316615049

SECTION 1. WASTE DESCRIPTION

A. Waste Description: WASTE PAINT RELATED MATERIAL
B. EPA Hazardous Waste Code(s) : D001 F003 F005
C. Source Code : G06 D. Form Code : W209 Management Method :
E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM : 3. Pounds (lbs) Density : 8.00 lb/gal.
B. Quantity Generated in Current Reporting Year : 1,400.0

SECTION 3: QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System1:Management Method : Quantity managed on-site this year : 0.0
On-Site System2:Management Method : Quantity managed on-site this year : 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to : KYD985073196
C. Management method shipped to : H061
D. Total quantity shipped in this reporting year : 1,400.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to :
C. Management method shipped to :
D. Total quantity shipped in this reporting year : 0.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to :
C. Management method shipped to :
D. Total quantity shipped in this reporting year : 0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to :
C. Management method shipped to :
D. Total quantity shipped in this reporting year : 0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to :
C. Management method shipped to :
D. Total quantity shipped in this reporting year : 0.0

COMMENTS : N

Page : 00004

Validated

ILLINOIS Environmental Protection Agency
2012 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID : ILD984778241 IL EPA ID : 0316615049

SECTION 1. WASTE DESCRIPTION

A. Waste Description: HAZARDOUS WASTE SOLID (ACETONE)

B. EPA Hazardous Waste Code(s) : F003

C. Source Code : G06

D. Form Code : W002

Management Method : _____

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM : 3. Pounds (lbs) Density : 8.00 lb/gal .

B. Quantity Generated in Current Reporting Year : 2,500.0

SECTION 3: QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System1:Management Method : _____ Quantity managed on-site this year : 0.0

On-Site System2:Management Method : _____ Quantity managed on-site this year : 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year?

Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to : KYD985073196

C. Management method shipped to : H141

D. Total quantity shipped in this reporting year : 2,500.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

COMMENTS : N

Page#: 00002 *Validated*

ILLINOIS Environmental Protection Agency
2012 Hazardous Waste Report
Form TI - Transporter Identification

US EPA ID: ILD984778241 IL EPA ID: 0316615049

1.	U.S. EPA ID N	<u>OHD042311209</u>	Hauling Permit	<u>UPW0090502OH</u>
2.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
3.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
4.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
5.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
6.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
7.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
8.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>

Comments: N

**ILLINOIS Environmental Protection Agency
2012 Hazardous Waste Report
B.O.L. Inventory Data / Addresses**

US EPA ID: ILD984778241

IL EPA ID: 0316615049

Facility Location

Send Mail Here? N

Company Name:	JOHN MANEELY CO WHEATLAND TUBE		
Telephone:	7733468805	P.O.Box:	
Street Address:	4435 S. Western Blvd.		
City, State, Zip:	CHICAGO IL	60609	
Contact Person:	Jennifer Bogs		

Owner Address

Send Mail Here? N

Company Name:	JMC STEEL GROUP/WHEATLAND TUBE		
Telephone:	7733468805	P.O.Box:	608
Street Address:	4435 S. Western Blvd.		
City, State, Zip:	Chicago IL	60609	
Contact Person:	Jennifer Bogs		

Operator Address

Send Mail Here? N

Company Name:	JOHN MANEELY CO WHEATLAND TUBE		
Telephone:	7733468805	P.O.Box:	
Street Address:	4435 WESTERN BLVD		
City, State, Zip:	CHICAGO IL	60609	
Contact Person:	Jennifer Bogs		

Annual Report Mailing Address

Company Name:	JOHN MANEELY CO WHEATLAND TUBE		
Telephone:	7733468805	P.O.Box:	
Street Address:	4435 S WESTERN BLVD		
City, State, Zip:	CHICAGO IL	60609	
Contact Person:	First Name Jennifer	Last Name Bogs	Title D
Email Address:	jennifer.bogs@jmcsteel.com		



Wheatland Tube
JMC STEEL GROUP

4435 South Western Boulevard
Chicago, Illinois 60609
773-254-0617

December 9, 2014

Illinois Environmental Protection Agency
Bureau of Land #24
1021 N. Grand Ave. E.
Springfield, Illinois 62794-9276

**RE: US EPA ID ILD069992014/ IL EPA 0316615090 and ILD984778241/ IL EPA 0316615049
2013 Hazardous Waste Report Corrections**

To Whom It May Concern:

Upon review of its submitted 2013 hazardous waste report for US EPA IDs ILD069992014/ IL EPA 0316615090 and ILD984778241/ IL EPA 0316615049, Wheatland Tube Co. – Chicago Division discovered eight errors to its 2013 hazardous waste report submission. These corrections are attached to this letter and are as follows:

- 1) For US EPA ID ILD069992014/ IL EPA 0316615090, on page 0003 for "Waste Paint Related Material," the quantity generated in the reporting year should be 83,031 lbs.
- 2) For US EPA ID ILD984778241/ IL EPA 0316615049, on page 0004 for "Hazardous Waste Solid Acetone," the quantity generated in the reporting year should be 6,963 lbs.
- 3) For US EPA ID ILD984778241/ IL EPA 0316615049, on page 0005 for "Liquid Chromium," the quantity generated in the reporting year should be 124,500 lbs.
- 4) For US EPA ID ILD984778241/ IL EPA 0316615049, on page 0006 for "Waste Solid N.O.S. Chromium," the quantity generated in the reporting year should be 5,963 lbs.
- 5) For US EPA ID ILD984778241/ IL EPA 0316615049, on page 0007 for "Waste Copper Sulfate," the quantity generated in the reporting year should be 1,376 lbs.
- 6) For US EPA ID/ IL EPA 0316615049, on page 0002 for "Hazardous Waste Solid (Chromium)," the quantity generated in the reporting year should be 40,613 lbs.
- 7) For US EPA ID/ IL EPA 0316615049, on page 0005 for "Liquid Non-Flammable Paint Material," the quantity generated in the reporting year should be 42,000 lbs.
- 8) For US EPA ID/ IL EPA 0316615049, on page 0006 for "Liquid Chromium," the quantity generated in the reporting year should be 63,383 lbs.

Wheatland Tube – Chicago Division also disclosed these corrections to the US EPA Land and Chemicals Division to RCRA Inspector Michael Valentino. Please feel free to contact me at (773) 346-8805 if additional information is needed or if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Bogs". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

Jennifer Bogs
Environmental Manager
(773) 346-8805

Enclosures

Validated

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form IC -- Identification and Certification

US EPA ID: ILD069992014 IL EPA ID: 0316615090

HAZARDOUS WASTE

RCRA Generator Status: <u>1</u>	<input type="checkbox"/> N Transporter of Hazardous Waste <input type="checkbox"/> N Transfer Facility (at your site) <input type="checkbox"/> N Treater, Storer, or Disposer of Hazardous Waste <input type="checkbox"/> N Recycler of Hazardous Waste (at your site) Exempt Boiler and/or Industrial Furnace: <input type="checkbox"/> N Small Quantity On-Site Burner exemption <input type="checkbox"/> N Smelting, Melting Refining Furnace exemption <input type="checkbox"/> N Underground Injection Control
Generator Activities <input type="checkbox"/> N United States Importer of Hazardous Waste <input type="checkbox"/> N Mixed Waste(hazardous&radioactive) Generator	
Universal Waste Activities <input type="checkbox"/> N Large Quantity Handler (5000 kg) <div>Managed</div> Batteries <input type="checkbox"/> Pesticides <input type="checkbox"/> Mercury Containing Equipment <input type="checkbox"/> Lamps <input type="checkbox"/> <input type="checkbox"/> N Destination Facility for Universal Waste	Used Oil Activities <input type="checkbox"/> N Used Oil Transporter <input type="checkbox"/> N Used Oil Transfer Facility <input type="checkbox"/> N Used Oil Processor <input type="checkbox"/> N Used Oil Re-refiner <input type="checkbox"/> N Off-Specification Used Oil Burner <input type="checkbox"/> N Marketer Who Directs Off-Spec Oil to Burner <input type="checkbox"/> N Marketer Who Claims Oil Meets Spec.
NAICS Code(s) for this Location <u>331210</u> <u>331210</u> <u>0</u> <u>0</u>	Site Land Type: <u>1</u> Owner Type: <u>1</u> Owner Start Date: <u>01/01/1969</u> Operator Type: <u>1</u> Operator Start Date: <u>01/01/1969</u>

Comments: N

Company Contact: JENNIFER, BOGS

Title: D

Phone: 7243468805

Page : 00003

Validated

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID : ILD069992014 IL EPA ID : 0316615090

SECTION 1. WASTE DESCRIPTION

A. Waste Description: WASTE PAINT RELATED MATERIAL

B. EPA Hazardous Waste Code(s) : D001 F003 F005

C. Source Code : G06

D. Form Code : W209

Management Method :

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM : 1. Gallons Pounds Density : 8.00 lb/gal .

B. Quantity Generated in Current Reporting Year : 77,500.0 83,031.0

SECTION 3: QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System1:Management Method : Quantity managed on-site this year : 0.0

On-Site System2:Management Method : Quantity managed on-site this year : 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year?

Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to : KYD985073196

C. Management method shipped to : H061

D. Total quantity shipped in this reporting year : 12,500.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to : WID990829475

C. Management method shipped to : H061

D. Total quantity shipped in this reporting year : 6,500.0 70,531.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year : 0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year : 0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year : 0.0

COMMENTS : N

Page : 00004

Validated

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID : ILD069992014

IL EPA ID : 0316615090

SECTION 1. WASTE DESCRIPTION

A. Waste Description: **HAZARDOUS WASTE SOLID (ACETONE)**

B. EPA Hazardous Waste Code(s) : F003 D001

C. Source Code : G06

D. Form Code : W002

Management Method : _____

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM : 1. Gallons Pounds Density : 8.00 lb/gal.

B. Quantity Generated in Current Reporting Year : 8,500.0 6,963.0

SECTION 3: QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.) N

On-Site System1:Management Method : _____ Quantity managed on-site this year : 0.0

On-Site System2:Management Method : _____ Quantity managed on-site this year : 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to : KYD985073196

C. Management method shipped to : H141

D. Total quantity shipped in this reporting year : 1,000.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to : MID980615298

C. Management method shipped to : H141

D. Total quantity shipped in this reporting year : 7,500.0 5,963.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

COMMENTS : N

Page: 00005

Validated

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID: ILD069992014 IL EPA ID: 0316615090

SECTION 1. WASTE DESCRIPTION

A. Waste Description: LIQUID CHROMIUM

B. EPA Hazardous Waste Code(s): D007

C. Source Code: G06

D. Form Code: W209

Management Method: _____

B. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM: 1. Gallons pounds Density: 8.00 lb/gal.

B. Quantity Generated in Current Reporting Year: 124,500.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System1: Management Method: _____ Quantity managed on-site this year: 0.0

On-Site System2: Management Method: _____ Quantity managed on-site this year: 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year?

Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to: IND000646943

C. Management method shipped to: H141

D. Total quantity shipped in this reporting year: 24,500.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to:

MD980615298

C. Management method shipped to:

H141

D. Total quantity shipped in this reporting year:

99,997.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to:

D. Total quantity shipped in this reporting year:

0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to:

D. Total quantity shipped in this reporting year:

0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to:

D. Total quantity shipped in this reporting year:

0.0

COMMENTS: N

Page : 00006

Validated

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID : ILD069992014 IL EPA ID : 0316615090

SECTION 1. WASTE DESCRIPTION

A. Waste Description: WASTE SOLID N.O.S. CHROMIUM

B. EPA Hazardous Waste Code(s) : D007

C. Source Code : G06

D. Form Code : W209

Management Method : _____

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM : 1. Gallons *Pounds* Density : 8.00 lb/gal.

B. Quantity Generated in Current Reporting Year : ~~4,400.0~~ 5,963.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System1:Management Method : _____ Quantity managed on-site this year : 0.0

On-Site System2:Management Method : _____ Quantity managed on-site this year : 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year?

Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to :

MID980615298

C. Management method shipped to :

H141

D. Total quantity shipped in this reporting year :

~~4,400.0~~ 5,963.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year :

0.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year :

0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year :

0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year :

0.0

COMMENTS : N

Page: 00007

Validated

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID: ILD069992014 IL EPA ID: 0316615090

SECTION 1. WASTE DESCRIPTION

A. Waste Description: WASTE COPPER SULFATE

B. EPA Hazardous Waste Code(s): D008

C. Source Code: G06 D. Form Code: W113 Management Method:

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM: 1. Gallons Pounds Density: 8.00 lb/gal.

B. Quantity Generated in Current Reporting Year: 500.0 1,376.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System1:Management Method: Quantity managed on-site this year: 0.0

On-Site System2:Management Method: Quantity managed on-site this year: 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year?

Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to: WID990829475

C. Management method shipped to: H141

D. Total quantity shipped in this reporting year: 500.0 1,376.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to:

D. Total quantity shipped in this reporting year: 0.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to:

D. Total quantity shipped in this reporting year: 0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to:

D. Total quantity shipped in this reporting year: 0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to:

D. Total quantity shipped in this reporting year: 0.0

COMMENTS: N

Page: 00008

Validated

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID: ILD069992014 IL EPA ID: 0316615090

SECTION 1. WASTE DESCRIPTION

A. Waste Description: WASTE HYDROCHLORIC ACID

B. EPA Hazardous Waste Code(s): D002

C. Source Code: G02

D. Form Code: W103

Management Method:

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM: 1. Gallons *Pounds* Density: 8.00 lb/gal.

B. Quantity Generated in Current Reporting Year: 6,000.0

SECTION 3: QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System1:Management Method: Quantity managed on-site this year: 0.0

On-Site System2:Management Method: Quantity managed on-site this year: 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year?

Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to: IND000646943

C. Management method shipped to: H121

D. Total quantity shipped in this reporting year: 4,210.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to: WID990829475

C. Management method shipped to: H121

D. Total quantity shipped in this reporting year: 1,790.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to:

D. Total quantity shipped in this reporting year: 0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to:

D. Total quantity shipped in this reporting year: 0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to:

C. Management method shipped to:

D. Total quantity shipped in this reporting year: 0.0

COMMENTS: N

**ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
B.O.L. Inventory Data / Addresses**

US EPA ID: ILD069992014

IL EPA ID: 0316615090

Facility Location

Send Mail Here? **Y**

Company Name:	WHEATLAND TUBE		
Telephone:	7732540617	P.O.Box:	
Street Address:	4435 S. WESTERN BLVD.		
City, State, Zip:	CHICAGO IL	60609	
Contact Person:	JENNIFER BOGS		

Owner Address

Send Mail Here? **N**

Company Name:	JMC STEEL GROUP		
Telephone:	3122751600	P.O.Box:	
Street Address:	227 W MONROE ST 26TH FL		
City, State, Zip:	CHICAGO IL	60606	
Contact Person:	JENNIFER BOGS		

Operator Address

Send Mail Here? **N**

Company Name:	WHEATLAND TUBE		
Telephone:	7732540617	P.O.Box:	
Street Address:	4435 S. WESTERN BLVD.		
City, State, Zip:	CHICAGO IL	60609	
Contact Person:	JENNIFER BOGS		

Annual Report Mailing Address

Company Name:	WHEATLAND TUBE		
Telephone:	7243468805	P.O.Box:	
Street Address:	4435 S. WESTERN BLVD.		
City, State, Zip:	CHICAGO IL	60609	
Contact Person:	JENNIFER	BOGS	D
Email Address:	jennifer.bogs@jmcsteel.com		

Page#: 00003 *Validated*

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form TI - Transporter Identification

US EPA ID: ILD069992014 IL EPA ID: 0316615090

1.	U.S. EPA ID N	<u>MNS000110924</u>	Hauling Permit	<u>5228</u>
2.	U.S. EPA ID N	<u>OHR000162800</u>	Hauling Permit	<u>5303</u>
3.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
4.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
5.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
6.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
7.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
8.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>

Comments: N

Not Validated

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form IC -- Identification and Certification

US, EPA ID: ILD984778241 IL, EPA ID: 0316615049

HAZARDOUS WASTE

RCRA Generator Status: <u>1</u>	<input type="checkbox"/> N Transporter of Hazardous Waste <input type="checkbox"/> N Transfer Facility (at your site) <input type="checkbox"/> N Treater, Storer, or Disposer of Hazardous Waste <input type="checkbox"/> N Recycler of Hazardous Waste (at your site) Exempt Boiler and/or Industrial Furnace: <input type="checkbox"/> N Small Quantity On-Site Burner exemption <input type="checkbox"/> N Smelting, Melting Refining Furnace exemption <input type="checkbox"/> N Underground Injection Control
Generator Activities <input type="checkbox"/> N United States Importer of Hazardous Waste <input type="checkbox"/> N Mixed Waste(hazardous&radioactive) Generator	
Universal Waste Activities <input type="checkbox"/> N Large Quantity Handler (5000 kg) <div style="text-align: right;">Managed</div> Batteries <input type="checkbox"/> Pesticides <input type="checkbox"/> Mercury Containing Equipment <input type="checkbox"/> Lamps <input type="checkbox"/> <input type="checkbox"/> N Destination Facility for Universal Waste	Used Oil Activities <input type="checkbox"/> N Used Oil Transporter <input type="checkbox"/> N Used Oil Transfer Facility <input type="checkbox"/> N Used Oil Processor <input type="checkbox"/> N Used Oil Re-refiner <input type="checkbox"/> N Off-Specification Used Oil Burner <input type="checkbox"/> N Marketer Who Directs Off-Spec Oil to Burner <input type="checkbox"/> N Marketer Who Claims Oil Meets Spec.
NAICS Code(s) for this Location <u>331210</u> <u>0</u> <u>0</u>	Site Land Type: <u>1</u> Owner Type: <u>1</u> Owner Start Date: <u>01/01/1969</u> Operator Type: <u>1</u> Operator Start Date: <u>01/01/1969</u>

Comments: N

Company Contact: JENNIFER, BOGS

Title: D

Phone: 7732540617

Page : 00002

Validated

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID : ILD984778241

IL EPA ID : 0316615049

SECTION 1. WASTE DESCRIPTION

A. Waste Description: HAZ WASTE SOLID (CHROMIUM)

B. EPA Hazardous Waste Code(s) : D007

C. Source Code : G06

D. Form Code : W002

Management Method : _____

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM : 1. Gallons *Pails* Density : 8.00 lb/gal.

B. Quantity Generated in Current Reporting Year : 39,000.0 *40,613.0*

SECTION 3: QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System 1: Management Method : _____ Quantity managed on-site this year : 0.0

On-Site System 2: Management Method : _____ Quantity managed on-site this year : 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year?

Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to :

IND000646943

C. Management method shipped to :

H121

D. Total quantity shipped in this reporting year :

1,500.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to :

KYD985073196

C. Management method shipped to :

H121

D. Total quantity shipped in this reporting year :

1,500.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to :

WID990829475

C. Management method shipped to :

H121

D. Total quantity shipped in this reporting year :

5,270.0 *5,963.1*

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to :

MID980615298

C. Management method shipped to :

H121

D. Total quantity shipped in this reporting year :

30,400.0 *31,650.3*

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year :

0.0

COMMENTS : N

Page : 00003

Validated

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID : ILD984778241 IL EPA ID : 0316615049

SECTION 1. WASTE DESCRIPTION

A. Waste Description: WASTE PAINT RELATED MATERIAL

B. EPA Hazardous Waste Code(s) : D001 F003 F005

C. Source Code : G06

D. Form Code : W209

Management Method :

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM : 1. Gallons *Pounds* Density : 8.00 lb/gal .

B. Quantity Generated in Current Reporting Year : 1,900.0

SECTION 3. QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System1:Management Method : Quantity managed on-site this year : 0.0

On-Site System2:Management Method : Quantity managed on-site this year : 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year?

Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to : IND000646943

C. Management method shipped to : H061

D. Total quantity shipped in this reporting year : 500.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to : KYD985073196

C. Management method shipped to : H061

D. Total quantity shipped in this reporting year : 500.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to : WID990829475

C. Management method shipped to : H061

D. Total quantity shipped in this reporting year : 900.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year : 0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year : 0.0

COMMENTS : N

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID : ILD984778241 IL EPA ID : 0316615049

SECTION 1. WASTE DESCRIPTION

A. Waste Description: HAZARDOUS WASTE SOLID ACETONE

B. EPA Hazardous Waste Code(s) : F003

C. Source Code : G06

D. Form Code : W002

Management Method : _____

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM : 1. Gallons *Pounds* Density : 8.00 lb/gal .

B. Quantity Generated in Current Reporting Year : 900.0

SECTION 3: QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System1:Management Method : _____ Quantity managed on-site this year : 0.0

On-Site System2:Management Method : _____ Quantity managed on-site this year : 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to : MID980615298

C. Management method shipped to : H141

D. Total quantity shipped in this reporting year : 900.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

COMMENTS : N

Page : 00005

Validated

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID : ILD984778241 IL. EPA ID : 0316615049

SECTION 1. WASTE DESCRIPTION

A. Waste Description: LIQUID NON-FLAMMABLE PAINT

B. EPA Hazardous Waste Code(s) : D007

C. Source Code : G06

D. Form Code : W209

Management Method : _____

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM : 1. Gallons *gallons* Density : 8.00 lb/gal.

B. Quantity Generated in Current Reporting Year : 4,200.0 *42,000.0*

SECTION 3: QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System1:Management Method : _____ Quantity managed on-site this year : 0.0

On-Site System2:Management Method : _____ Quantity managed on-site this year : 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year?

Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to : IND000646943

C. Management method shipped to : H121

D. Total quantity shipped in this reporting year :

4,200.0

42,000.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year :

0.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year :

0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year :

0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to :

C. Management method shipped to :

D. Total quantity shipped in this reporting year :

0.0

COMMENTS : N

Page : 00006

Validated

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form GM -- Generation and Management

US EPA ID : ILD984778241 IL. EPA ID : 0316615049

SECTION 1. WASTE DESCRIPTION

A. Waste Description: HAZ WASTE LIQUID CHROMIUM

B. EPA Hazardous Waste Code(s) : D007

C. Source Code : G06

D. Form Code : W002

Management Method : _____

E. Waste Minimization Code: N

SECTION 2. QUANTITY GENERATED:

A. UOM : 1. Gallons *Pounds* Density : 8.00 lb/gal .

B. Quantity Generated in Current Reporting Year : ~~61,000.0~~ 63,383.0

SECTION 3: QUANTITY MANAGED ON-SITE:

Did this location manage some or all of this waste in RCRA or UIC regulated treatment, recycling, or disposal units at this location? (DO NOT include RCRA exempt processes.)

N

On-Site System 1: Management Method : _____ Quantity managed on-site this year : 0.0

On-Site System 2: Management Method : _____ Quantity managed on-site this year : 0.0

SECTION 4. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y

SITE 1.

B. U.S. EPA ID No. of facility waste was shipped to : IND000646943

C. Management method shipped to : H121

D. Total quantity shipped in this reporting year : 1,000.0

SITE 2.

B. U.S. EPA ID No. of facility waste was shipped to : MID980615298

C. Management method shipped to : H121

D. Total quantity shipped in this reporting year : ~~60,000.0~~ 62,383.0

SITE 3.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

SITE 4.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

SITE 5.

B. U.S. EPA ID No. of facility waste was shipped to : _____

C. Management method shipped to : _____

D. Total quantity shipped in this reporting year : 0.0

COMMENTS : N

Page#: 00002 *Validated*

ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
Form TI - Transporter Identification

US EPA ID: ILD984778241 IL EPA ID: 0316615049

1.	U.S. EPA ID N	<u>OHR000162800</u>	Hauling Permit	<u>5303</u>
2.	U.S. EPA ID N	<u>MNS000110924</u>	Hauling Permit	<u>5228</u>
3.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
4.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
5.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
6.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
7.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>
8.	U.S. EPA ID N	<u> </u>	Hauling Permit	<u> </u>

Comments: N

**ILLINOIS Environmental Protection Agency
2013 Hazardous Waste Report
B.O.L. Inventory Data / Addresses**

US EPA ID: ILD984778241

IL EPA ID: 0316615049

Facility Location

Send Mail
Here?

Y

Company Name:	JOHN MANEELY CO WHEATLAND TUBE		
Telephone:	7732540617	P.O.Box:	
Street Address:	2300 W. 47TH ST.		
City, State, Zip:	CHICAGO IL	60609	
Contact Person:	JENNIFER BOGS		

Owner Address

Send Mail
Here?

N

Company Name:	JMC STEEL GROUP/WHEATLAND TUBE		
Telephone:	7733468805	P.O.Box:	
Street Address:	4435 S. WESTERN BLVD.		
City, State, Zip:	WHEATLAND IL	60609	
Contact Person:	JENNIFER BOGS		

Operator Address

Send Mail
Here?

N

Company Name:	JOHN MANEELY CO WHEATLAND TUBE		
Telephone:	7732540617	P.O.Box:	
Street Address:	4435 S WESTERN BLVD		
City, State, Zip:	CHICAGO IL	60609	
Contact Person:	JENNIFER BOGS		

Annual Report Mailing Address

Company Name:	JOHN MANEELY CO WHEATLAND TUBE		
Telephone:	7732540617	P.O.Box:	
Street Address:	4435 S WESTERN BLVD		
City, State, Zip:	CHICAGO IL	60609	
	First Name	Last Name	Title
Contact Person:	JENNIFER	BOGS	D
Email Address:	JENNIFER.BOGS@JMCSTEEL.COM		

ATTACHMENT 4
HAZARDOUS WASTE SHIPMENTS SPREADSHEETS FOR 2012 AND 2013

WHEATLAND TUBE CO - CHICAGO PLANT

2012 Hazardous Waste Shipments

4435 S. Western Blvd (ILD069992014)							2300 W. 47th St. (ILD964778241)						
TSDF	Ship Date	Description	Quantity	Unit	Manifest	Close Date	Ship Date	Description	Quantity	Unit	Manifest	Close Date	
American Env Serv 1689 Shar-Cal Rd Calvert City, KY 42029 KYD985073196 (NEXEO) (270) 395-0504	2/3/12	Waste Paint Rel Matl (D001,F003)	3500	P	5285029FLE	2/10/12	2/3/12	Haz Waste solid (chromium) (D007)	1000	P	5285028FLE	2/10/12	
		Waste Hydrochloric Acid (D002)	500	P			3/23/12	Haz Waste solid (chromium) (D007)	1000	P	5212521FLE	3/28/12	
	3/23/12	Waste Paint Rel Matl (D001,F003)	10000	P	5212523FLE	3/28/12		Haz Waste solid (acetone) (F003)	2000	P			
		Waste Hydrochloric Acid (D002)	500	P			5/18/12	Waste Paint Rel Matl (D001,F003)	900	P	2059796FLE	5/22/12	
	5/18/12	Waste Paint Rel Matl (D001,F003)	9000	P	2059798FLE	5/23/12		Haz Waste solid (chromium) (D007)	600	P			
		Waste Hydrochloric Acid (D002)	300	P			7/13/12	Haz Waste solid (chromium) (D007)	500	P	5675001FLE	7/18/12	
		Haz Waste solid (acetone) (F003)	300	P			9/7/12	Waste Paint Rel Matl (D001,F003)	500	P	5586053FLE	9/11/12	
	7/13/12	Waste Paint Rel Matl (D001,F003)	17500	P	5674995FLE	7/18/12		Haz Waste solid (chromium) (D007)	450	P			
		Haz Waste solid (acetone) (F003)	1000	P			11/2/12	Haz Waste solid (chromium) (D007)	500	P	6138620FLE	11/9/12	
	9/7/12	Waste Paint Rel Matl (D001,F003)	12500	P	5586051FLE	9/11/12		Haz Waste solid (acetone) (F003)	500	P			
		Haz Waste solid (acetone) (F003)	1000	P									
	11/2/12	Waste Paint Rel Matl (D001,F003)	16000	P	6138618FLE	11/9/12							
		Haz Waste solid (acetone) (F003)	600	P									
TradebeTrmt/Rcycln 4343 Kennedy Ave East Chicago, IN 46312 (800) 388-7242	9/7/12	Waste Hydrochloric Acid (D002)	400	P	5586050FLE	9/10/12							
	11/2/12	Waste Hydrochloric Acid (D002)	500	P	6138617FLE	11/6/12							
		HWR Totals							HWR Totals				
		Waste HCL	2,200.00	P					Solid Chromium	4,050.00	P		
		Waste Paint Related Material	68,500.00	P					Waste Paint Related Material	1,400.00	P		
		Acetone Waste	2,900.00	P					Acetone Waste	2,500.00	P		

2013 Hazardous Waste Shipments

	4335 S. Western Blvd (ILD069992014)						2300 W. 47th St. (ILD964778241)					
TSDF	Ship Date	Description	Quantity	Unit	Manifest	Close Date	Ship Date	Description	Quantity	Unit	Manifest	Close Date
Treatment, storage and disposal facility	US DOT Description						US DOT Description					
Tradebe Treatment and Recycling LLC, 4343 Kennedy Ave, East Chicago, IN, 46912 (IND000646943)	3/14/13	Waste corrosive liquid, NOS (HCL) (D002)	1000	P	006053681FLE	3/19/13	3/11/13	Haz. waste liquid non-flammable paint mat. (D007)	42000	P	006053671FLE	3/12/13
		Hazardous waste liquid NOS, chromium (D007)	24500	P			3/11/13	Waste Paint Rel Mat (D001,F003,F005)	500	P	006053672FLE	3/14/13
	8/23/13	Hydrochloric Acid Contaminated Debris	275	G	002173362GBF	8/30/13	3/14/13	Haz Waste solid, NOS (chromium) (D007)	1500	P	002059224FLE	3/19/13
		Hydrochloric Acid Contaminated Debris	110	G				Haz waste liquid (chromium) (D007)	1000	P		
Transporter: NEXEO (OHR000162800) IEPA HAULING ID: 5303												
AES Environmental LLC, 1689 Shar-Cal Rd, Ivert City, KY, 42029 (KYD985073195)	3/14/13	Waste Paint Rel Mat (D001,F003,F005)	12500	P	006053676FLE	3/20/13	3/11/13	Waste Paint Rel Mat (D001,F003,F005)	500	P	006053672FLE	3/12/13
		Hazardous waste solid (acetone) (F003)	1000	P				Haz Waste solid (chromium) (D007)	1500	P		
Transporter: NEXEO (OHR000162800) IEPA HAULING ID: 5303												
Petro-Chem Processing Group, 421 Lyncaste Avenue, Detroit, MI 48214 (MID980615298)	4/24/13	Hazardous waste liquid NOS, chromium (D007)	1870	G			5/2/13	Hazardous waste liquid NOS, chromium (D007)	1485	G	004887730FLE	5/21/13
		Hazardous waste solid (acetone) (F003,D001)	165	G	004887715FLE	5/6/13		Haz Waste solid (chromium) (D007)	55	G		
		Haz Waste solid N.O.S. (chromium) (D007)	165	G			6/14/13	Haz waste liquid (chromium) (D007)	1925	G	004884818FLE	6/27/13
	5/2/13	Hazardous waste liquid NOS, chromium (D007)	770	G	004887735FLE	5/15/13		Hazardous waste liquid NOS, chromium (D007)	1550	G		
	6/14/13	Hazardous waste liquid NOS, chromium (D007)	1375	G			8/1/2013	Hazardous waste solid (acetone) (F003,D001)	110	G	004878970FLE	8/6/2013
		Hazardous waste solid (acetone) (F003,D001)	165	G	004878851FLE	6/27/13	9/26/13	Haz Waste solid (chromium) (D007)	110	G		
		Haz Waste solid N.O.S. (chromium) (D007)	55	G			11/1/13	Haz Waste solid (chromium) (D007)	2035	G	004879080FLE	10/9/13
	8/1/2013	Hazardous waste liquid NOS, chromium (D007)	2420	G	004878968FLE	8/6/2013	12/20/13	Haz Waste solid (chromium) (D007)	1595	G	004879164FLE	11/13/13
		Hazardous waste solid (acetone) (F003,D001)	220	G				Haz waste liquid (chromium) (D007)	2420	G		
		Hazardous waste liquid NOS, chromium (D007)	1815	G	004879082FLE							
	9/26/13	Haz Waste solid N.O.S. (chromium) (D007)	110	G	004879082FLE	10/9/2013						
	11/1/2013	Hazardous waste solid (acetone) (F003,D001)	220	G	004879194FLE	11/13/2013						
	11/1/2013	Hazardous waste liquid NOS, chromium (D007)	1595	G	004879165FLE	11/13/2013						
		Hazardous waste solid NOS, chromium (D007)	165	G								
		Hazardous waste liquid NOS, chromium (D007)	2145	G								
		Hazardous waste solid (acetone) (F003,D001)	165	G	4886353FLE							
	Hazardous waste solid NOS, chromium (D007)	55	G									
WRR Environmental Services, 5200 Ryder Rd, Eau Claire, WI 54701 (WID990829475)	4/24/13	Waste Paint Rel Mat (D001,F003,F005)	1155	G	004887716FLE	4/30/13	5/2/13	Haz Waste solid, NOS (chromium) (D007)	165	G	004887733FLE	5/8/13
	5/2/13	Waste Paint Rel Mat (D001,F003,F005)	330	G	004887734FLE	5/6/13	8/1/13	Waste Paint Rel Mat (D001,F003,F005)	55	G	004878966FLE	
	6/14/13	Waste Paint Rel Mat (D001,F003,F005)	1430	G	004887819FLE	6/26/13	9/26/13	Haz Waste solid, NOS (chromium) (D007)	165	G	004879079FLE	8/6/13
		Waste solids w/ corrosive liquid, NOS (HCL) (D002)	55	G			11/1/13	Waste Paint Rel Mat (D001,F003,F005)	55	G	004879163FLE	11/8/13
	8/1/13	Waste Paint Rel Mat (D001,F003,F005)	1540	G	004878966FLE	8/6/13	12/20/13	Haz Waste solid, NOS (chromium) (D007)	165	G	004879346FLE	
		Waste solids w/ corrosive liquid, NOS (HCL) (D002)	55	G								
	9/26/2013	Waste Paint Rel Mat (D001,F003,F005)	2090	G	004879081FLE							
		Waste Env. Haz Substance (CuSO4, Pb) PGIII (D008)	330	G	004879168FLE	11/8/13						
	11/1/2013	Waste Paint Rel Mat (D001,F003,F005)	1540	G	004879167FLE	11/8/13						
		Waste solids w/ corrosive liquid, NOS (HCL) (D002)	55	G								
	Waste Env. Haz Substance (CuSO4, Pb) PGIII (D008)	55	G									
	Waste Paint Rel Mat (D001,F003,F005)	42	G									
	Waste solids w/ corrosive liquid, NOS (HCL) (D002)	55	G	004886351FLE								
	Waste Env. Haz Substance (CuSO4, Pb) PGIII (D008)	110	G	004886366FLE								
R3 Environmental Consignee: Hydrite Chemical Company 2545 Bond Street University Park, IL							8/19/13	Hydrochloric Acid (D002)	43,800	P	130593	
							This shipment was not actual waste-was shipped off-site for holding while we repaired our acid tanks.					
Safety-Kleen 601 Riley Road E. Chicago, IN 46312-1628 IND077042034 TXR000081205	12/9/13	Waste Combustible Liquid NOS	6	G	003966208SKS	12/9/13						
Hazardous Waste Report Calculations Bldg #1												
TOTAL LIQUID CHROMIUM IN 2013 SHIPPED OFF-SITE		36490	24500	11990								
TOTAL WASTE PAINT RELATED MATERIAL IN 2013 SHIPPED OFF-SITE		20527	12500	8127								
HWR Report Totals												
Waste Paint Related Material		83,031	P									
Acetone		6,963	P									
Liquid Chromium		124,497	P									
Solid Chromium		5,963	P									
Copper Sulfate		1,376	P									
HCL		6,046	P									
HWR Report Totals												
Solid Chromium		40,613	P									
Waste Paint Related Material		1,917	P									
Acetone		917	P									
Liquid Non-Flamm Paint		42,000	P									
Liquid Chromium		63,383	P									
BUILDING 3 YEARLY WASTE GENERATION TOTAL		148,831	P									

		BUILDING 1 YEARLY WASTE GENERATION TOTAL	227,876	P
		TOTAL BLDG AND BLDG 3	69,429	P
B1 Liquid Chromium Gallons to LBS Conversion:				
Liquid Chromium In Gallons =	11,990			
Liquid Converted to Gallons From Lbs =	99,997			
Liquid Already In Lbs =	24,500			
Total Liquid Chromium in Lbs =	124,497			
B3 Liquid Chromium Gallons to LBS Conversion:				
Liquid Chromium In Gallons =	7,480			
Liquid Converted to Gallons From Lbs =	62,383			
Liquid Already In Lbs =	1,000			
Total Liquid Chromium in Lbs =	63,383			
B1 Waste Paint Related Material Gallons to LBS Conversion:				
Waste Paint in Gallons =	8,457			
Waste Paint Converted to Gallons From Lbs =	70,531			
Waste Paint Already In Lbs =	12,500			
Total Waste Paint in Lbs =	83,031			
B3 Waste Paint Related Material Gallons to LBS Conversion:				
Waste Paint in Gallons =	110			
Waste Paint Converted to Gallons From Lbs =	917			
Waste Paint Already In Lbs =	1,000			
Total Waste Paint in Lbs =	1,917			
B1 Acetone Gallons to LBS Conversion:				
Acetone in Gallons =	715			
Acetone Converted to Gallons From Lbs =	5,963			
Acetone Already In Lbs =	1,000			
Total Acetone in Lbs =	6,963			
B3 Acetone Gallons to LBS Conversion:				
Acetone in Gallons =	110			
Acetone Converted to Gallons From Lbs =	917			
Acetone Already In Lbs =	0			
Total Acetone in Lbs =	917			
B1 Solid Chromium Gallons to LBS Conversion:				
Solid Chromium in Gallons =	715			
Solid Chromium Converted to Gallons From Lbs =	5,963			
Solid Chromium Already In Lbs =	0			
Total Solid Chromium in Lbs =	5,963			
B3 Solid Chromium Gallons to LBS Conversion:				
Solid Chromium in Gallons =	4,510			
Solid Chromium Converted to Gallons From Lbs =	37,613			
Solid Chromium Already In Lbs =	3,000			
Total Solid Chromium in Lbs =	40,613			
B1 Copper Sulfate Gallons to LBS Conversion:				
Copper Sulfate in Gallons =	165			
Copper Sulfate Converted to Gallons From Lbs =	1,376			
Copper Sulfate Already In Lbs =	0			
Total Copper Sulfate in Lbs =	1,376			
B1 HCL Gallons to LBS Conversion:				
HCL in Gallons =	605			
HCL Converted to Gallons From Lbs =	5,046			
HCL Already In Lbs =	1,000			
Total HCL in Lbs =	6,046			

ATTACHMENT 5
TSDF-SIGNED HAZARDOUS WASTE MANIFESTS

308454/505445

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number XLD003992014	2. Page 1 of 1	3. Emergency Response Phone NEXCO SOLUTIONS 1-800-830-3543	4. Manifest Tracking Number 006053681 FLE		
5. Generator's Name and Mailing Address WHEATLAND TUBE CO 4435 S. WESTERN AVENUE CHICAGO IL 60609			Generator's Site Address (if different than mailing address) WHEATLAND TUBE COMPANY 4435 S WESTERN AVE CHICAGO IL 60609				
Generator's Phone: 773-254-0417 ATTN: CHRISTINE WALCH			U.S. EPA ID Number 030000152600				
6. Transporter 1 Company Name NEXCO SOLUTIONS			U.S. EPA ID Number				
7. Transporter 2 Company Name			U.S. EPA ID Number				
8. Designated Facility Name and Site Address TRENDS TREATMENT AND RECYCLING LLC 1341 KENNEDY AVE. EAST CHICAGO IN 46312 600-366-7262			U.S. EPA ID Number IND000556249				
Facility's Phone:							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	Type	11. Total Quantity	12. Unit WL/Vol.	13. Waste Codes
	X	1. 001760, WASTE CORROSIVE LIQUIDS, N.O.S. (HYDROCHLORIC ACID), 8, III, 75-11549 ACID RAG WASTE, FLAMMABLE/TOXIC	2	DF	1000	g	D002
	X	2. 100052, HAZARDOUS WASTE, LIQUID, N.O.S. (COOL), 9, III, 800000, 75-12717 NON FLAMMABLE LIQUID WASTE, FLAMMABLE/TOXIC	49	DM	4500	g	D001
	X	3. 7182, HAZARDOUS WASTE LIQUID N.O.S. 9 75-13719 NON FLAMMABLE LIQUID WASTE, FLAMMABLE/TOXIC PAINT WASTE & DEBRIS	70	DM	1000	g	
	X	4.					
14. Special Handling Instructions and Additional Information A-H 12/6/81							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name AXEL E. AVILA			Signature Axel E. Avila		Month Day Year 3 14 13		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:							
17. Transporter Acknowledgment of Receipt of Materials							
Transporter 1 Printed/Typed Name MICHAEL ANDERSON c/o NEXCO			Signature Michael Anderson c/o NEXCO		Month Day Year 03 14 13		
Transporter 2 Printed/Typed Name			Signature		Month Day Year		
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number:							
18b. Alternate Facility (or Generator) U.S. EPA ID Number							
Facility's Phone:							
18c. Signature of Alternate Facility (or Generator) Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H111		2. H111		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name SAMUEL GREGORY			Signature Samuel Gregory		Month Day Year 03 14 13		

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST
(Continuation Sheet)

21. Generator ID Number

1L0984778241

22. Page

2

23. Manifest Tracking Number

004879080FL

24. Generator's Name

Wheatland Tube Co.

25. Transporter Company Name

A.R. Poquette

U.S. EPA ID Number

FLD982105884

26. Transporter Company Name

U.S. EPA ID Number

27a.
HM

27b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))

28. Containers

No.

Type

29. Total
Quantity

30. Unit
Wt./Vol.

31. Waste Codes

32. Special Handling Instructions and Additional Information

33. Transporter Acknowledgment of Receipt of Materials

Printed/Typed Name

Maurice Colay

Signature

Maurice Colay

Month Day Year

11/03/13

34. Transporter Acknowledgment of Receipt of Materials

Printed/Typed Name

Signature

Month Day Year

35. Discrepancy

36. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

208932

1717653437

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number ID984778241	2. Page 1 of 2	3. Emergency Response Phone 800-755-3024	4. Manifest Tracking Number 004879080 FLE
5. Generator's Name and Mailing Address WHEATLAND TUBE CO 2300 W 47TH STREET CHICAGO, IL 60609 Generator's Phone: 773-254-0617					
6. Transporter 1 Company Name STERICYCLE SPECIALTY WASTE				U.S. EPA ID Number HNS000110924	
7. Transporter 2 Company Name				U.S. EPA ID Number	
8. Designated Facility Name and Site Address PETRO-CHEM PROCESSING GROUP 421 LYCASTE AVENUE DETROIT, MI 48214 Facility's Phone: 800-776-0221				U.S. EPA ID Number HID980615298	
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.
1. RQ, NA3082, HAZARDOUS WASTE, LIQUID, N.O.S. (CHROMIUM), 9, PGIII, (D007)		037 DM		02035	G
2. RQ, NA3082, Hazardous Waste, Liquid, N.O.S. (Chromium), 9, PGIII (D007)					
3.					
4.					
13. Waste Codes D007					
14. Special Handling Instructions and Additional Information 11142146MKA266867 2-142144 MKA266863 ER CCN#MIS0002711 3633D					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.					
Generator's/Offeror's Printed/Typed Name AXEL E AVILA		Signature [Signature]		Month Day Year 7/6/1999	
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:					
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Mark Cook Signature [Signature] Month Day Year 09/26/13 Transporter 2 Printed/Typed Name Eric Finney Signature [Signature] Month Day Year 10/2/13					
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number					
Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month Day Year					
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H141 2. 3. 4.					
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 19a Printed/Typed Name Amanda Yangplad Signature [Signature] Month Day Year 11/09/13					

437

Please print or type (Form 103 (Rev. 12-01-03) (Use on 12-pitch type only))

BRTS Contract #: 4727

Form Approved OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number IL 984778241	2. Page 1 of 1	3. Emergency Response Phone (800) 451-8346	4. Manifest Tracking Number 001684227 GBF
5. Generator's Name and Mailing Address Wheatland Tube Co. 2300 W. 47 th Street Chicago, IL 60609 Generator's Phone: (773) 254-0617					
6. Transporter's Name and Mailing Address Stericycle, Specialty Waste Solutions, Inc. Stericycle, Inc. 10000 W. 111 th Street Chicago, IL 60658 Transporter's Phone: (773) 254-0617					
7. Designated Facility's Name and Mailing Address Petro-Chem Processing Group 421 Lycaon St. Detroit, MI 48214 Facility's Phone: (313) 824-5840					
8. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)) 1. RQ NA3077, Hazardous Waste Solid, n.o.s., 9, PG III (RQ-D007)(Chromium)					
9a. HM No.		10. Containers No. Type		11. Total Quantity	12. Unit Wt/Vol
X		001 DM		00055	G
13. Waste Codes D007					
14. Special Handling Instructions and Additional Information 9b1. HRC# 171; Profile# 142143					
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled, placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment, I am the Primary Exporter. I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste is not a listed waste as defined in 40 CFR 262.22(a) (1) (I am a large quantity generator) or (b) (I am a small quantity generator) is true.					
16. Generator's/Offeror's Printed Typed Name: <u>Boggs</u> Signature: <u>[Signature]</u> Date: <u>04/09/14</u>					
17. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: <u>[Blank]</u> Date leaving U.S.: <u>[Blank]</u>					
18. Transporter's Signature (for export only): <u>[Signature]</u> Date: <u>[Blank]</u>					
19. Transporter's Acknowledgment of Receipt of Materials Transporter 1 Printed Typed Name: <u>Frank Cook</u> Signature: <u>[Signature]</u> Date: <u>04/09/14</u> Transporter 2 Printed Typed Name: <u>[Signature]</u> Signature: <u>[Signature]</u> Date: <u>04/09/14</u>					
20. Discrepancy 20a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
21. Alternate Facility (or Generator) Facility's Phone: <u>[Blank]</u> U.S. EPA ID Number: <u>[Blank]</u>					
22. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest. I certify that the materials are as described in Item 18a. Printed Typed Name: <u>[Signature]</u> Signature: <u>[Signature]</u> Date: <u>04/09/14</u>					

COPY

GENERATOR

TRANSPORTER

DESIGNATED FACILITY

EPA Form 103 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

TRANSPORTER	INT'L	←	GENERATOR
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UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number ILD984778240	2. Page 1 of 1	3. Emergency Response Phone 800-255-3924	4. Manifest Tracking Number 004836804 FLE		
5. Generator's Name and Mailing Address WHEATLAND TUBE CO. 2300 W 74TH STREET CHICAGO IL 60609 Generator's Phone: 773-341-8805			Generator's Site Address (if different than mailing address)				
6. Transporter 1 Company Name STERICYLE SPECIALTY WASTE			U.S. EPA ID Number MN8000J10924				
7. Transporter 2 Company Name Hydrite Chemical Company			U.S. EPA ID Number ILD984448466				
8. Designated Facility Name and Site Address TRADEBE TREATMENT & RECYCLING 4343 KENNEDY AVENUE EAST CHICAGO, IN 46312 Facility's Phone: 219-397-3951			U.S. EPA ID Number IND000646943				
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers: No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1	UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, SOLID, N.O.S. (COPPER SULFATE), 9, PELD, (HRM)	001	DF	00055	g	NRM
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information ER CCN#MTS0002711 L855136							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name William Villalobos			Signature [Signature]		Month Day Year 05 25 14		
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Hank Cook Signature [Signature] Month Day Year 05 25 14 Transporter 2 Printed/Typed Name Mark Brown Signature [Signature] Month Day Year 05 25 14						
DESIGNATED FACILITY	18. Discrepancy						
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	Manifest Reference Number: _____ U.S. EPA ID Number _____						
	18b. Alternate Facility (or Generator) Facility's Phone: _____						
18c. Signature of Alternate Facility (or Generator) Month Day Year 05 25 14							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. NA		2.		3.		4.	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a							
Printed/Typed Name Leanna Domic			Signature [Signature]		Month Day Year 05 25 14		

ATTACHMENT 6
FACILITY PLOT OF SURVEY

